

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*One (1) Target Location and Two (2) Target Vehicles,  
as more fully described in Attachment A

Case No. MJ23-146

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

One (1) Target Location and Two (2) Target Vehicles, as more fully described in Attachment A, incorporated herein by reference

located in the Western District of Washington, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 USC §§ 841 and 846	Possession with Intent to Distribute Controlled Substances, Distribution of Controlled
18 USC § 922 and 924	Substances, Conspiracy to Distribute Controlled Substances, Unlawful Possession of a
	Firearm, and Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The application is based on these facts:

- ☒ See Affidavit of DEA Task Force Officer Christopher VandenBos, continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



*Applicant's signature*

Christopher VandenBos, DEA Task Force Officer

*Printed name and title*

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or  
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/30/2023



*Judge's signature*

City and state: Seattle, Washington

Mary Alice Theiler, United States Magistrate Judge

*Printed name and title*

**ATTACHMENT A**

**PROPERTY TO BE SEARCHED**

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found.

For physical locations, this includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports, parking stalls, specifically the parking stall numbered “239”, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location described below.

For vehicles to be searched, this includes all areas of the vehicle, all compartments, and all containers within that vehicle, whether locked or not.

## Residence

### Target Location 1: 15045 5<sup>th</sup> Avenue SW, Unit 337, Burien, Washington 98166

15045 5<sup>th</sup> Avenue SW, Unit 337, Burien, Washington 98166 is an apartment located in an apartment complex in Burien, WA named “The Maverick”. Unit 337 has a grey door and a silver door handle. There is a circular orange sign to the right of the apartment door with the number “337” printed on it.



**Vehicles**

**Target Vehicle 1: a white Tesla Model 3 (WA /CFC3954)**

A white Tesla Model 3 sedan bearing the Washington plate CFC3954.

**Target Vehicle 5: a black Cadillac Escalade (WA /BMA8616)**

A black 2013 Cadillac Escalade sports utility vehicle (SUV) bearing the Washington plate BMA8616.



1 hour Criminal Investigations Using Cellular Technologies course hosted in Las Vegas,  
2 Nevada, a twenty four hour Fugitive Mission Planning and Cellular Investigative  
3 Techniques course hosted in Bellingham, Washington, a forty-hour DEA Task Force  
4 Officer School hosted in Quantico, Virginia, and other training courses related to  
5 criminal street gangs, narcotics trafficking, electronic surveillance, money laundering,  
6 and fentanyl-related overdose deaths. I have completed hundreds of hours of law  
7 enforcement related training, to include investigatory techniques, surveillance, evidence  
8 collection, cell phone technology, and other topics.

9 4. As a Whatcom County Sheriff's Office Deputy, I have participated in  
10 multiple death investigations, including homicide, overdose, and natural death  
11 investigations. I have participated in fugitive operations spanning multiple states, and  
12 have used my training and experience as it relates to electronic evidence to capture  
13 wanted subjects who were fleeing from law enforcement.

14 5. Based on my training and experience, I have become familiar with the  
15 techniques and methods used by drug traffickers to distribute controlled substances,  
16 their use of vehicles, their use of cellular phones and other electronic communication  
17 devices to facilitate their trafficking activity, and the methods used to conceal and  
18 launder the proceeds of drug trafficking. I have participated in hundreds of hours of  
19 surveillance on narcotics traffickers. I have examined narcotics related pay/owe ledgers,  
20 supplier lists, and cell phone content, and understand how they are used in relation to  
21 drug sales and trafficking. During the course of my employment, I have served search  
22 warrants and conducted narcotics-related interviews in Washington and other states,  
23 and have discussed drug trafficking and money laundering trends with members of  
24 federal and state law enforcement from across the United States, as well as those  
25 working in other countries.

26 6. I have experience acting in an undercover capacity. I have purchased  
27 controlled substances such as fentanyl-laced pills, fentanyl-laced powder, cocaine,  
28 heroin, and methamphetamine while acting in an undercover capacity. While acting in

1 an undercover role, I have arranged narcotics transactions, discussed counter-  
2 surveillance methods to avoid law enforcement, and discussed prices, quantity, and  
3 quality of various controlled substances.

4 7. I have attended a course instructed by the Canadian Royal Mounted  
5 Police (RCMP) Clandestine Laboratory Enforcement and Response team, which  
6 discussed topics on synthetic drug manufacturing, including information regarding  
7 fentanyl in powder and pill form. During that training, I participated in a pill  
8 encapsulating demonstration using a pill press and other equipment.

9 8. In the year 2014, I obtained a Bachelor of Arts (BA) from Western  
10 Washington University in Sociology, with an emphasis in Criminology. During that  
11 time, I completed research courses involving Mexico-based drug trafficking networks,  
12 statistics, and data analytics. I also obtained a minor degree in Spanish Language.

13 9. I speak Spanish at the conversational level. I have used Spanish to  
14 interview confidential informants, witnesses, and suspects during the course of state and  
15 federal narcotics investigations. In my role as a Task Force Officer with the Drug  
16 Enforcement Administration, I have participated in Title III wiretap investigations, and  
17 have monitored live phone intercepts between Spanish-speaking drug traffickers. While  
18 monitoring these phone intercepts, I have spoken with certified Spanish translators, who  
19 have further explained common slang terms, expressions, and code words used by drug  
20 traffickers for narcotics-related language and terms.

21 10. I have participated, both as case agent and in supporting roles, in multiple  
22 state and federal investigations which have led to convictions. This Affidavit is based  
23 on information I have gained from my own investigation, personal observations,  
24 training and experience, as well as information related to me by other detectives,  
25 investigators and police officers through oral and written reports. This Affidavit is  
26 meant to establish probable cause; therefore, I have not included every fact known to  
27 me at this time. I have reviewed and am familiar with the investigative file in this  
28 matter.

1           11.     Affiant has training and experience as it relates to the blue “M 30”  
2 stamped suspected fentanyl-laced pills mentioned in this Affidavit. Your Affiant is  
3 aware that there is no readily available field test for the suspected fentanyl-laced pills in  
4 Whatcom County, WA. Your Affiant has been involved in the seizure of thousands of  
5 similar fentanyl-laced pills, and has submitted the same pills for testing. Your Affiant  
6 has reviewed laboratory analysis reports from both the Drug Enforcement  
7 Administration (DEA) and Washington State Patrol (WSP) laboratories, which have  
8 indicated the presence of fentanyl in similar pills. Your Affiant knows, based on  
9 training and experience, that similar suspected fentanyl-laced pills are commonly  
10 manufactured by clandestine laboratories in Mexico, and subsequently smuggled in the  
11 United States for redistribution and consumption. Your Affiant has spoken with  
12 multiple confidential sources who have admitted to the prior use of similar fentanyl-  
13 laced pills, and have testified to their narcotic effect.

14           12.     Since this Affidavit is being submitted for the limited purpose of seeking  
15 authorization for the above requested search warrants, I have not included every fact  
16 known to me concerning this investigation. I have set forth only the facts that I believe  
17 are essential to establish the necessary foundation for a fair determination of probable  
18 cause to support the Application. When the statements of others are set forth in this  
19 affidavit, they are set forth in substance and in part.

20                           **PURPOSE OF THIS AFFIDAVIT**

21           13.     I make this affidavit in support of an application for a warrant authorizing  
22 the search of the following locations and vehicles, which are further described below  
23 and in Attachment A, for evidence, fruits and instrumentalities of the crimes of  
24 Distribution of, and Possession with Intent to Distribute, Controlled Substances, in  
25 violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(B), Conspiracy to Distribute  
26 Controlled Substances, in violation of 21 U.S.C. § 846, Unlawful Possession of a  
27 Firearm, in violation of 18 U.S.C. § 922(g)(1), and Possession of Firearms in  
28



1 Furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c), as further  
2 described in Attachment B:

- 3 a. **Target Location 1 (TL1): 15045 5<sup>th</sup> Avenue SW, Unit 337, Burien, Washington 98166:** 15045 5<sup>th</sup> Avenue SW, Unit 337, Burien, Washington  
4 98166 is an apartment located in an apartment complex in Burien, WA named  
5 “The Maverick”. Unit 337 has a grey door and a silver door handle. There is a  
6 circular orange sign to the right of the apartment door with the number “337”  
printed on it.
- 7 b. **Target Vehicle 1 (TV1): a white Tesla Model 3 (WA/CFC3954):** a white  
8 Tesla Model 3 sedan bearing the Washington plate CFC3954.
- 9 c. **Target Vehicle 5 (TV5): a black Cadillac Escalade (WA/BMA8616):** a black  
10 2013 Cadillac Escalade sports utility vehicle (SUV) bearing the Washington  
plate BMA8616.

11 14. For of the target location, authority to search extends to all storage areas  
12 associated with the apartment, including on-site storage lockers, garages, and parking  
13 stalls. Specifically, the parking stall numbered “239”. For the target vehicle(s) being  
14 searched, authority to search extends to all parts of the vehicle and any cases,  
15 containers, compartments, or safes located in the vehicle, whether locked or not, where  
16 the items described in Attachment B could be found.

### 17 SOURCES OF INFORMATION

18 15. I make this Affidavit based upon personal knowledge derived from my  
19 participation in this investigation and upon information I believe to be reliable from the  
20 following sources, which include but are not limited to:

- 21 a. My training and experience investigating drug trafficking and related criminal  
activity, as described above;
- 22 b. Oral and written reports and documents about this and other investigations that I  
23 have received from agents of the DEA, the Whatcom County Sheriff’s Office  
24 (WCSO), the Washington State Patrol (WSP), and other federal, state and local  
law enforcement agencies;
- 25 c. Physical and electronic surveillance conducted by the aforementioned agencies,  
26 and other law enforcement agencies, that has been reported to me directly or  
indirectly;
- 27 d. Telephonic call detail records, pen register and trap and trace information, and  
subscriber information;
- 28 e. Washington State Department of Licensing records;

- f. Commercial databases;
- g. Public records; and
- h. Publicly viewable information on social media websites (i.e., Facebook, Instagram).

16. In the following paragraphs, I describe communications between various individuals. Except where specifically indicated with quotation marks, the descriptions are summaries of the conversations and are not meant to reflect the specific words or language used.

### SUMMARY OF PROBABLE CAUSE<sup>1</sup>

#### Summary and Target Identifiers

17. The following target identifiers, i.e. “Target Telephone”, “Target Vehicle”, “Target Device”, or “Target Account”, may be referenced in this application:

Target Identifier	Number/Account/Vehicle	Suspected User
Target Telephone 1 (TT1)	206-759-0635	Mohamed Mohamed
Target Telephone 2 (TT2)	206-635-1192	Ahbdurman Ahmed
Target Telephone 3 (TT3)	206-304-2908	Robel Gebremedhin
Target Vehicle 1 (TV1)	Tesla Model 3 (WA/CFC3954)	Ahbdurman Ahmed
Target Vehicle 2 (TV2)	Dodge Durango (CA/9BDL778)	Mohamed Mohamed
Target Vehicle 5 (TV5)	Cadillac Escalade (WA/BMA8616)	Robel Gebremedhin
Target Device 1 (TD1)	iPhone Cell Phone	Natasha Parkhill
Target Device 2 (TD2)	iPhone Cell Phone	Robel Gebremedhin
Target Device 3 (TD3)	iPhone Cell Phone	Robel Gebremedhin
Target Account 1 (TA1)	Facebook - 100009951665587	Ahbdurman Ahmed
Target Account 2 (TA2)	Facebook - 100086986098055	Mohamed Mohamed
Target Account 3 (TA3)	Facebook - 100070857993090	Matthew Anderson
Target Account 4 (TA4)	Facebook - 100000242688378	Natasha Parkhill

<sup>1</sup> In this section, I describe communications between various individuals. Except where specifically indicated with quotation marks, the descriptions are summaries of the conversations and are not meant to reflect the specific words or language used.

Target Account 5 (TA5)	Facebook - 100000853310448	C.K.
Target Location 1 (TL1)	15045 5 <sup>th</sup> Ave SW, 337, Burien, WA	Robel Gebremedhin

### Overview of Investigation.

18. On November 28, 2022, at about 11:00 p.m., a Washington State Patrol trooper stopped a vehicle for reckless driving. The driver was identified as Mohamed Abdirisak MOHAMED. Approximately \$1,700 in currency was located in MOHAMED's pocket. A narcotics detection canine alerted to the odor of narcotics in the vehicle, and the vehicle was seized pending a search warrant. Washington State Patrol troopers later served a Washington state search warrant on the vehicle, and located approximately four thousand suspected fentanyl-laced pills, drug packaging material, and a stolen firearm.

19. In the months that followed, investigators conducted both electronic and physical surveillance on MOHAMED's activities. Investigators observed evidence that MOHAMED was part of a larger group of individuals from the greater Seattle area who were trafficking fentanyl in Whatcom County, Washington. Law enforcement identified one of MOHAMED's suspected co-conspirators as Ahbdurman AHMED. Law enforcement identified another suspected drug distributor in their network as Robel GEBREMEDHIN, known by the moniker "Traffic". Law enforcement have identified and contacted individuals suspected of being re-distributors for MOHAMED, AHMED, and GEBREMEDHIN's drug trafficking organization in Whatcom County, and have seized thousands of suspected fentanyl-laced pills.

20. On February 26, 2023, investigators conducted an investigatory stop of Robel GEBREMEDHIN, in Bellingham, WA. Investigators later searched a Cadillac Escalade (Hereinafter referred to as **Target Vehicle 5**) associated with GEBREMEDHIN and located a large quantity of suspected fentanyl-laced pills and a stolen handgun. Investigators have identified GEBREMEDHIN's residence (hereinafter referred to as **Target Location 1**) in Burien, WA.

1 November 28, 2022: Seizure of approximately 4,000 fentanyl pills and a handgun from  
2 Mohamed Abdirisak MOHAMED (Counts 2, 3 & 4).

3       21. On November 28, 2022, at about 11:00 p.m., a Washington State Patrol  
4 (WSP) trooper was monitoring traffic on Interstate 5 near Meridian Street in  
5 Bellingham, Washington. The WSP trooper observed a vehicle being driven recklessly  
6 and at a high rate of speed.

7       22. The WSP trooper activated his emergency lights and stopped the vehicle  
8 in the area of 1901 King Street, Bellingham, Washington. The Toyota Camry, bearing  
9 WA plate BZP6861, was registered to EAN Holdings, indicating it was a rental vehicle.  
10 The WSP trooper identified the driver, and sole occupant of the vehicle, as Mohamed  
11 Abdirisak MOHAMED. MOHAMED said he was visiting friends in Whatcom County,  
12 WA. According to the Washington State Department of Licensing, MOHAMED had a  
13 listed address in Fife, Washington. The WSP Trooper took MOHAMED into custody  
14 for Reckless Driving (RCW 46.61.502). During a search incident to arrest, the WSP  
15 trooper located approximately \$1,700.00 in U.S. currency in MOHAMED's pocket.  
16 MOHAMED was advised of his Miranda warnings. From outside of the rental vehicle,  
17 a WSP Trooper could observe a package containing clear empty baggies in the back-  
18 seat area of the vehicle, which he recognized as items that could be used for drug  
19 redistribution. The WSP trooper asked MOHAMED if there were drugs in the vehicle,  
20 and MOHAMED said no. The WSP trooper asked for consent to search the vehicle,  
21 which MOHAMED declined. MOHAMED also had a cell phone in his possession that  
22 was not seized by the Trooper.

23       23. A Bellingham Police Department (BPD) narcotics detection K9 and  
24 handler arrived, the K9 was deployed around the vehicle, and a positive alert was given  
25 for the odor of narcotics. The vehicle was seized by investigators pending the  
26 application of a Washington state search warrant.

27       24. On November 30, 2022, Whatcom County District Court Judge Angela  
28 Anderson authorized a search warrant related to the Toyota Camry. WSP troopers  
executed the search warrant on the same date. WSP troopers located two different size

1 plastic bags containing a white powder in the driver's door of the vehicle. A WSP  
2 trooper located a cigarette container in the center console area of the vehicle which  
3 contained a bag of blue "M 30" stamped suspected fentanyl-laced pills. The WSP  
4 troopers found the glove box was locked. The glove box was unlocked using the  
5 ignition key of the vehicle. In the glovebox, WSP troopers located four sandwich sized  
6 zip-lock bags containing blue "M 30" stamped suspected fentanyl-laced pills

7 25. In the glove box on top of the pills, WSP troopers also located a loaded  
8 .40 caliber Glock semi-automatic handgun, serial number BGHB755. The following is  
9 a photo taken by WSP troopers during the search:



10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24 26. WSP troopers weighed the white powder, and found the combined weight  
25 was approximately 28.4 grams. Each of the bags containing the blue "M 30" stamped  
26 suspected fentanyl-laced pills were estimated, by weight, to contain approximately  
27 1000 pills. The smaller bag of suspected fentanyl-laced pills was estimated, by weight,  
28 to contain over 100 pills. The combined gross weight of the suspected fentanyl-laced



1 pills was approximately 460 grams. The following is an evidence photo taken by WSP  
2 troopers:



3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16 27. In the photo, the Glock handgun, the suspected fentanyl-laced pills, the  
17 two bags containing a white powder, and the empty plastic baggies can be observed.  
18 The WSP trooper estimated there were up to approximately a thousand empty baggies  
19 in the package. Based on my training and experience, this is distribution quantities of  
20 fentanyl and the small plastic baggies confirm the intent to repackage and redistribute  
21 the pills.

22 28. When the troopers searched the serial number through police databases,  
23 they found that handgun had been reported as stolen to the Bellingham Police  
24 Department during September of 2019.

25 29. The pills were submitted to the Washington State Patrol laboratory for  
26 analysis and were later confirmed to contain fentanyl.

27 30. A certified Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)  
28 interstate nexus expert was provided a description and photograph of the Glock .40

1 caliber handgun located in a vehicle. The ATF interstate nexus expert advised the  
2 firearm was not manufactured in the State of Washington and thus traveled in interstate  
3 or foreign commerce prior to being seized on November 28, 2022.

4 Information Regarding Target Telephone 1.

5 31. On December 8, 2022, the Honorable Whatcom County Superior Court  
6 Judge Evan Jones signed a search warrant and court order relating to the real-time  
7 prospective location, pen register and trap and trace, and historical information for TT1.  
8 Investigators served the judicial order on the carrier and received records in response.  
9 December 9, 2022: Seizure of 476 fentanyl pills from Matthew Anderson (Count 5).

10 32. On December 9, 2022, at about 10:51 PM, Bellingham Police Department  
11 Officer D'Amelio conducted a traffic stop on a vehicle for a registration violation.  
12 Officer D'Amelio identified the driver as S.B., and the passenger as Matthew  
13 ANDERSON. While speaking to the occupants, Officer D'Amelio noticed small  
14 baggies, commonly used to hold illegal drugs, in the driver's area. Bellingham Police  
15 Department (BPD) Officer Sturlaugson arrived with his narcotics detection canine  
16 partner, Destro. BPD Officer Sturlaugson deployed his canine partner around the  
17 vehicle and advised K9 Destro had given a positive alert to the presence of the odor of  
18 narcotics in or around the vehicle.

19 33. BPD Officer Sturlaugson spoke with ANDERSON outside of the vehicle  
20 and asked to search his pockets. ANDERSON agreed, and then removed a small bag of  
21 blue "M 30" stamped suspected fentanyl-laced pills from his pocket, which he handed  
22 to Officer Sturlaugson. ANDERSON declined to allow law enforcement to search the  
23 vehicle. The vehicle was impounded pending the application of a warrant.

24 34. On December 13, 2022, the Honorable Whatcom County Superior Court  
25 Commissioner Angela Cuevas issued a search warrant for that vehicle. On December  
26 15, 2022, BPD officers executed the search warrant. Inside they located two baggies  
27 containing suspected methamphetamine, a digital scale, and multiple empty baggies.  
28 During the traffic stop on December 9, 2022, ANDERSON had been seen accessing a

1 backpack. While searching the vehicle, BPD officers found and searched that backpack.  
2 It was found to contain approximately 476 blue “M30” suspected fentanyl-laced pills.

3 35. During the police contact on December 9, 2022, ANDERSON had  
4 provided his cell phone number to officers as 360-510-3847.

5 36. Investigators compared that phone number to phone records obtained  
6 relating to TT1. According to call detail records between approximately November 16,  
7 2022, and January 6, 2023, investigators saw there had been approximately 315  
8 telephonic contacts between MOHAMED’s TT1 and ANDERSON’s 360-510-3847.  
9 Specifically, investigators looked at call detail records for TT1 on December 9, 2022,  
10 the day of the traffic stop on ANDERSON. According to TT1’s call detail records,  
11 there had been approximately twenty contacts between ANDERSON’s 360-510-3847  
12 and MOHAMED’s TT1.

13 37. I believe, based on my training and experience, and based on the traffic  
14 stop and call detail records described above, that ANDERSON was a customer and  
15 drug re-distributor for MOHAMED.

16 December 12, 2022: Surveillance of MOHAMED and Identification of Ahbdurman AHMED.

17 38. On December 12, 2022, investigators observed real-time location data  
18 associated with TT1 was showing it was in the area of Bellingham, Washington.  
19 Investigators established surveillance in the area of the Motel 6, located at 3701 Bill  
20 McDonald Parkway in Bellingham, WA. While conducting surveillance, investigators  
21 observed MOHAMED going to and from Room 104 at the Motel 6. A second male,  
22 later identified by photo comparison with a WA DOL photo, as Ahbdurman AHMED,  
23 was also seen going in and out of Room 104.

24 39. Investigators watched the exterior facing door of Room 104 for about  
25 three hours. During that time, investigators saw that MOHAMED and AHMED  
26 appeared to be going back and forth between the area of a white Tesla sedan bearing  
27  
28



1 WA license plate CFC3954<sup>2</sup> (hereinafter **Target Vehicle 1** or **TV1**) at the hotel room.  
2 It appeared that AHMED would often stay in the white Tesla (**TV1**). Investigators  
3 watched several vehicles arrive in the motel parking lot, park near **TV1**, and then leave  
4 shortly after. **TV1** drove from the parking lot several times, and then would return a  
5 short time later.

6 40. Investigators did not have a direct view of **TV1**, but the short stay vehicle  
7 traffic was consistent, based on the training and experience of investigators, with drug  
8 sales. It appeared, based on the training and experience of investigators, MOHAMED  
9 and AHMED were likely staying in Room 104, and selling drugs out of **TV1**.

10 Investigators watched several females going in and out of Room 104. One of the  
11 females was recognized by investigators as C.K. Investigators were familiar with C.K.,  
12 as she had been contacted by local law enforcement several times over the previous  
13 years during drug investigations. Investigators later saw that C.K. had several active  
14 warrants for her arrest related to various felony offenses.

15 41. One of the vehicles that arrived at the Motel 6 was also known to law  
16 enforcement. At about 7:19 PM, **TV1** arrived at the Motel 6 parking lot. It was  
17 followed by a red Audi sedan bearing WA license plate CEN1184. Both vehicles  
18 parked. The red Audi was registered to L.P. Investigators recognized L.P., as he had  
19 been contacted by law enforcement on June 29, 2022, in a grocery store parking lot. A  
20 Whatcom County Sheriff's Office deputy had contacted L.P. after seeing him appearing  
21 to be smoking drugs inside of a vehicle. During that contact, L.P. had consented to  
22 search of his vehicle, which resulted in the seizure of approximately 21 gross weight  
23 grams (including packaging weight) of suspected methamphetamine, over 100 blue "M  
24 30" suspected fentanyl-laced pills, a small quantity of suspected heroin, and unused  
25 small baggies.

26  
27  
28 <sup>2</sup> According to the WA Department of Licensing, Washington license plate CFC3954 belongs to a white 2018  
Tesla Model 3 sedan, which is registered to S.B. at 13820 24<sup>th</sup> Ave S, SeaTac, Washington.

1           42. At about 7:22 PM on December 12, 2022, investigators observed  
2 AHMED and a male matching L.P. description meeting and speaking with each other in  
3 the parking lot of the Motel 6. At about 7:43 PM, the red Audi and TV1 left the parking  
4 lot at about the same time.

5 December 19, 2022: 911 Call from Oxford Inn in Bellingham, WA.

6           43. On December 19, 2022, employees from the Oxford Inn in Bellingham,  
7 called 911 regarding a drugs complaint and trouble with a guest. Hotel employees had  
8 located a bag of suspected drugs in one of their hotel rooms, and the guests of that room  
9 were refusing to leave. According to hotel records, the room had been rented to  
10 Mohamed MOHAMED. Hotel records showed MOHAMED's phone number matched  
11 TT1.

12           44. When law enforcement arrived, the hotel manager told law enforcement  
13 MOHAMED and two unknown females had left when they learned law enforcement  
14 had been called.

15 December 28, 2022: Seizure of approximately 4,000 fentanyl pills from Daniel FAIX  
16 (Count 6).

17           45. On December 28, 2022, plainclothes investigators were conducting  
18 surveillance on Daniel FAIX in Bellingham, Washington. FAIX was known to  
19 investigators as a local drug trafficker, with multiple recent law enforcement contacts  
20 related to drug trafficking. Law enforcement also knew that A.R. was FAIX's romantic  
21 partner. A.R. had been stopped by law enforcement on December 7, 2022. She had been  
22 arrested for an outstanding warrant at that time, and law enforcement found she was in  
23 possession of a handgun and over \$5,000.00 in US currency. She told law enforcement  
24 she had been on her way to purchase drugs with the money in Everett, WA.

25           46. On December 28, 2022, investigators watched as FAIX sat in a parked  
26 vehicle at the Bellis Fair Mall parking lot in Bellingham, WA. At about 2:48 PM,  
27 investigators watched as FAIX began walking around the mall parking lot, appearing to  
28 be speaking on a cell phone. Investigators watched as FAIX got into the passenger seat  
of a silver Audi sedan that had been circling the parking lot. At about 2:50 PM,

1 investigators saw FAIX get out of the Audi, and return to his vehicle. The Audi left the  
 2 area shortly after. The circumstances were consistent, based on the training and  
 3 experience of investigators, with a drug transaction. A plainclothes investigator later  
 4 saw the driver of the silver Audi, and saw he matched the description of Mohamed  
 5 MOHAMED.

6 47. A uniformed Whatcom County Sheriff's Office (WCSO) deputy  
 7 approached FAIX's vehicle on foot. As he approached the vehicle, the deputy saw  
 8 FAIX sitting in the passenger seat of the vehicle. The WCSO deputy observed a clear  
 9 plastic container with blue "M 30" suspected fentanyl-laced pills in FAIX's lap.

10 48. The WCSO deputy removed FAIX from the vehicle and detained him in  
 11 handcuffs. FAIX was advised of his Miranda Warnings. FAIX consented to a search of  
 12 his pockets, and three bags of blue "M 30" suspected fentanyl-laced pills were located.

13 49. A female was contacted in the driver's seat of the vehicle, who was  
 14 identified as H.F. When asked about a purse in the vehicle, H.F. claimed it was hers.  
 15 She allowed law enforcement to search the purse, which was found to contain US  
 16 currency and a bag of blue "M 30" suspected fentanyl-laced pills. After she observed  
 17 the pills, H.F. said the purse did not belong to her.

18 50. The following is a photo of some of the items seized during the contact:



1           51. Investigators estimated, based on weight, that there were approximately  
2 4,000 blue “M 30” suspected fentanyl-laced pills, spread between four different bags;  
3 three of those bags located in FAIX’s pockets, and one from inside of the vehicle. The  
4 combined bags weighed approximately 440 gross weight grams. Over \$4,000.00 in US  
5 currency was also seized from FAIX during the contact.

6           52. Law enforcement spoke with FAIX. FAIX told law enforcement he had  
7 just met with a black male named “Malik”, who had just given FAIX the drugs. FAIX  
8 said “Malik” drove an Audi. FAIX said “Malik” was part of a group of individuals who  
9 would come to the Bellingham area every few days to supply people with drugs. Law  
10 enforcement recognized the moniker “Malik” as associated with Mohamed Abdirisak  
11 MOHAMED.

12           53. Investigators knew A.R. had previously given her phone number to law  
13 enforcement, and Daniel FAIX had also previously given his phone number to law  
14 enforcement. Investigators reviewed judicially authorized call detail records for a cell  
15 phone suspected to be used by Mohamed MOHAMED on December 28, 2022. The  
16 phone number belonging to MOHAMED was the same phone number provided by  
17 MOHAMED to WSP troopers when he was stopped on November 28, 2022, driving the  
18 rental vehicle.

19           54. Investigators looked at call detail records for **TT1** (MOHAMED) on  
20 December 28, 2022. Investigators knew A.R. had previously given her phone number to  
21 law enforcement as 360-603-1179, and Daniel FAIX had previously given his phone  
22 number as 360-927-0477. On December 28, 2022, investigators saw there were  
23 approximately 13 telephonic contacts between FAIX’s 360-927-0477 and  
24 MOHAMED’s **TT1**. On the same date, investigators saw there were approximately 5  
25 telephonic contacts between A.R.’s 360-603-1179 and MOHAMED’s **TT1**. Judicially  
26 authorized location information for MOHAMED’s cell phone (TT1) showed it was in  
27 Whatcom County, Washington when FAIX was contacted.  
28

1 December 30, 2022: Overdose of Ahbdurman AHMED.

2       55. On December 30, 2022, at about 5:39 PM, Lummi Law and Order  
3 (LL&O) Tribal Police Officers were dispatched to a fentanyl overdose in process in the  
4 area of the Lummi Mini Mart located at 4884 Haxton Way, Ferndale, WA. Officers  
5 arrived and observed a male and female lying on the ground of the parking lot. Both  
6 were unresponsive. They were lying in front of a white Tesla sedan bearing WA license  
7 plate CFC3954 (**Target Vehicle 1**). Officers administered naloxone to both individuals  
8 to counteract the overdose. Medical personnel arrived, and both individuals were  
9 transported for medical treatment. Investigators believe both survived the incident.

10       56. Officers interviewed A.F., who said she had been in **TV1** with a female  
11 named T.D. and a black male she knew as "O". A.F. said while they were all in the  
12 vehicle, she had seen T.D. and "O" snort fentanyl powder prior to their overdose.

13       57. **TV1** was towed by Heston Hauling at the request of the Lummi Mini  
14 Mart. Law enforcement did not have a key, and therefore were unable to complete an  
15 inventory of the vehicle prior to towing.

16       58. On December 31, 2022, an employee of Heston Hauling contacted  
17 Lummi Law and Order law enforcement regarding the vehicle. The employee advised  
18 they had completed an inventory of **TV1**, per Heston Hauling policy and procedure.  
19 During that inventory, a Heston Hauling employee had located a backpack containing  
20 approximately 233 blue "M 30" suspected fentanyl-laced pills. The Heston Hauling  
21 employee stated A.F. had called inquiring about the backpack. An identification card  
22 belonging to A.F. was also observed in the backpack. LL&O officers responded to  
23 impound the suspected fentanyl-laced pills.

24       59. Investigators spoke with LL&O Officer Berrios, who advised the male  
25 known as "O" matched the description of Ahbdurman AHMED, based off of a  
26 Washington State Department of Licensing photograph.

27       60. Investigators reviewed surveillance footage at around that time from the  
28 Lummi Mini Mart. Before the overdose, video showed a male approaching **TV1** on



1 foot, and getting into the backseat area of the vehicle. Approximately three minutes  
2 later, the male got out of the vehicle and left the area. Investigators recognized the  
3 circumstances as being consistent with a drug transaction. Whatcom Gang and Drug  
4 Task Force investigators were familiar with A.F., who has at least one prior felony  
5 conviction related to the Manufacturing/Delivery of a Controlled Substance in  
6 Washington State.

7 January 9, 2023: Surveillance of AHMED and MOHAMED and seizure of fentanyl  
8 pills from J.S. Sr. and J.S. Jr.

9 61. On January 9, 2023, investigators observed Mohamed MOHAMED in the  
10 Bellis Fair Mall parking lot in Bellingham, Washington. MOHAMED was driving a  
11 black Dodge Durango with California license plates 9BDL778 (Hereinafter Target  
12 Vehicle 2 or TV2). According to law enforcement databases, that vehicle was registered  
13 to PV Holding Corporation, a company associated with rental cars. An investigator  
14 spoke on the phone with a representative from the Avis Rent A Car rental company,  
15 who confirmed the vehicle was one of their rental vehicles. According to the Avis  
16 representative, the vehicle had been rented under the name "Essag Hassan" with an  
17 associated address of 5861 South 152<sup>nd</sup> Street, Tukwila, WA. The vehicle had been  
18 rented on January 4, 2023, in SeaTac, WA and was due back on January 31, 2023.

19 62. Investigators watched MOHAMED as he drove Target Vehicle 2 around  
20 Bellingham, WA. At about 5:34 PM, investigators were watching TV2 in a Taco Time  
21 fast food restaurant parking lot in the area of Samish Way, Bellingham, WA. At around  
22 that time, the white Tesla bearing WA/CFC3954 (TV1) arrived in the area. When it  
23 arrived, investigators saw the Dodge Durango bearing CA/9BDL778 (TV2) flash its  
24 high beams at TV1 in an apparent signal. Investigators watched as individuals went  
25 back and forth between TV1 and TV2 while they were parked in a Walgreens  
26 convenience store parking lot.

27 63. At about 6:41 PM, investigators watched a black male get out of TV2 and  
28 get into TV1. TV1 drove to a nearby apartment complex parking area, still within view  
of TV2. At about 6:48 PM, an Acura sedan bearing the license plate WA/CEN2987

1 arrived and driving slowly through the Walgreens parking lot. Investigators watched as  
2 TV2 flashed its high beams at the Acura sedan, in what appeared to be an obvious  
3 signal to the vehicle. Investigators observed TV1 also flash its high beams in the  
4 direction of the Acura sedan. Investigators saw, based on information from the  
5 judicially authorized pen register and trap and trace information, that MOHAMED's  
6 TT1 received an inbound voice call from AHMED's TT2 that lasted approximately one  
7 minute and twenty-three seconds in duration at about that time.

8         64. The Acura sedan stopped in the lane of travel in the apartment complex  
9 parking area. A female passenger got out of the Acura sedan, and appeared to meet with  
10 the driver of TV1, who was standing outside of the vehicle. After the meeting, the  
11 Acura sedan departed. After the Acura sedan left the parking lot, TV1 drove from the  
12 area. Shortly after, TV2 also left the area. Investigators followed the Acura sedan.

13         65. Investigators watched as the Acura sedan stopped in a nearby Fred  
14 Meyer's grocery store parking lot. A male got out of the Acura sedan, and then got into  
15 a white Chevrolet Silverado pickup truck. After about a minute, the male got out of the  
16 Chevrolet Silverado and returned to the Acura sedan. The circumstances were  
17 consistent, based on the training and experience of investigators, with a drug  
18 transaction.

19         66. Whatcom County Sheriff's Office Deputy Chambers, a uniformed deputy,  
20 approached the Chevrolet Silverado on foot. As Deputy Chambers walked up to the  
21 vehicle, Deputy Chambers observed the male occupant appeared to be counting pills in  
22 his lap.

23         67. The male was identified as J.S. Sr. who consented to a search of his  
24 vehicle, and law enforcement recovered approximately one hundred blue "M 30"  
25 suspected fentanyl-laced pills. J.S. Sr. told law enforcement he had received the pills  
26 from his son, J.S. Jr. Law enforcement later weighed the suspected fentanyl-laced pills,  
27 and found they weighed approximately 15.3 gross grams.  
28

1           68.     Whatcom County Sheriff's Office deputies approached the Acura sedan,  
2 which was still in the same Fred Meyer's parking lot. The occupants were identified as  
3 J.S. Jr. and M.J.

4           69.     J.S. Jr. was advised of the Miranda warnings. During a subsequent  
5 conversation with law enforcement, J.S. Jr. admitted to having pills on his person. J.S.  
6 Jr. provided a bag containing approximately one hundred blue "M 30" suspected  
7 fentanyl-laced pills to law enforcement. Law enforcement later weighed the suspected  
8 fentanyl-laced pills, and found they weighed approximately 11.2 gross weight grams.

9           70.     Law enforcement spoke with M.J. who told law enforcement that she and  
10 J.S. Jr. had previously purchased fentanyl from a black male named "O". M.J. said "O"  
11 drove a white Tesla (suspected to be TV1) and was from the Seattle, Washington area.  
12 Information from Confidential Informant regarding AHMED and MOHAMED.

13           71.     During the month of January 2023, investigators with the Whatcom Gang  
14 and Drug Task Force (WGDTF) spoke with a WGDTF Confidential Source<sup>3</sup>  
15 (hereinafter referred to as the CS). The CS recognized a photo of Mohamed  
16 MOHAMED as a drug trafficker in Whatcom County, WA. The CS stated MOHAMED  
17 used the phone number 206-759-0635 (TT1). The CS said MOHAMED used Cash App  
18 to collect money. The CS said MOHAMED's Cash App name was "Moe!" and his  
19 handle was "\$FellaBabyy206".

20           72.     The CS recognized a photo of Ahbdurman AHMED as a drug trafficker in  
21 Whatcom County, WA. The CS stated AHMED went by the name "O". The CI said  
22 AHMED used the phone number 206-635-1192 (TT2). The CS said AHMED used  
23

---

24 <sup>3</sup> The CS is cooperating with investigators in return for prosecutorial consideration after being contacted by law  
25 enforcement with a firearm and distribution quantities of a controlled substance. The CS has criminal convictions  
26 related to Trafficking Stolen Property, Burglary, Possession of a Controlled Substance, and Driving While  
27 License Suspended. The CS has prior arrests and/or outstanding cases, which include crimes of dishonesty,  
28 including, but not limited to, Theft 2<sup>nd</sup> Degree, Burglary, Possession of Another's Identification, Failure to  
Comply, Criminal Impersonation 1<sup>st</sup> Degree, and Obstructing Law Enforcement. Investigators have previously  
used information provided by the CS and have found the CS to have given accurate and truthful information,  
which was verified from outside sources. Investigators believe the CS to be proven and reliable as a source of  
accurate information.



1 Cash App to collect money. The CI said AHMED's Cash App name was "Obsa  
2 Ahmed" and his handle was "\$bigbag3900".

3 73. The CS said AHMED and MOHAMED were from the Seattle area. The  
4 CS said they trafficked fentanyl in Whatcom County. The CS stated they also trafficked  
5 prostitutes. The CS stated they sold large quantities of drugs in Whatcom County, often  
6 renting hotel rooms to use for selling controlled substances.

7 74. The CS told investigators a male known as "Traffic" was associated with  
8 AHMED, and also distributed controlled substances in Whatcom County, WA. The CI  
9 believed "Traffic" was also from the Seattle, WA area.

10 Information and Call Detail Records for TT1 and TT2.

11 75. While observing both historical and prospective location information  
12 received for TT1 between November 16, 2022, and January 6, 2023, investigators saw  
13 that TT1 travelled between the greater Seattle, Washington area and Whatcom County  
14 on a regular basis. As a general trend, TT1 would spend several days in the Seattle area,  
15 and then return to Whatcom County for several days.

16 76. Investigators observed call detail records showing contact between  
17 MOHAMED's TT1 and AHMED's TT2. Between November 16, 2022, and January 6,  
18 2023, investigators observed there were approximately 1,012 contacts between TT1 and  
19 TT2. Within TT1's call detail records during that timeframe, TT2 was the fourth most  
20 commonly contacted phone number, making up approximately 5.8% of TT1's overall  
21 telephonic contacts. Investigators saw that between November 16, 2022, and January 6,  
22 2023, TT1 and TT2 were in contact with each other on every single day, with the  
23 exception of one day.

24 77. Investigators believe that Mohamed MOHAMED has used, and is  
25 continuing to use, TT1 to further his drug trafficking activities. Investigators believe  
26 that AHMED has used TT2 to further his drug trafficking activities. Based on the call  
27 detail records for TT1, physical surveillance, law enforcement contacts with AHMED  
28 and MOHAMED, and information from a confidential source, it appeared to

1 investigators that MOHAMED and AHMED were working together in their illegal  
2 activities.

3 78. Investigators conducted a search of 206-635-1192 (TT2) in law  
4 enforcement databases. Investigators saw that on September 3, 2022, a male named  
5 Ahbdurman AHMED called 911 from 206-635-1192 (TT2). AHMED had questions  
6 regarding a rental vehicle that had been towed in Bellevue, Washington.

7 January 10, 2023: Attempted Contact with C.M.

8 79. On January 10, 2023, investigators were conducting plainclothes  
9 surveillance in the area of Motel 6 in Bellingham, WA. Investigators had observed  
10 Target Vehicle 2 parked in the parking lot and had seen MOHAMED go into Room 215  
11 of the hotel. Later, TV1 arrived in the parking lot, and a male matching AHMED's  
12 description went into Room 215.

13 80. While conducting surveillance on that date, investigators observed a  
14 female visit Room 215 for approximately thirty minutes. She was later identified, via  
15 surveillance photographs, as Natasha PARKHILL. PARKHILL left in a Subaru  
16 Forester bearing WA/CFT1155.

17 81. Later in the evening, investigators watched as TV1 left the Motel 6  
18 parking lot, and briefly parked alongside a Saab bearing WA/BES2522. The drivers of  
19 TV1 and the Saab appeared to be meeting. The vehicles departed shortly after. Law  
20 enforcement attempted to conduct a traffic stop of the Saab bearing WA/BES2522, but  
21 the driver fled in the vehicle. Law enforcement discontinued the pursuit of the vehicle,  
22 and it was not located that day.

23 82. Later, photographs of the Saab driver were recognized as being consistent  
24 with C.M., who had several warrants for his arrest. C.M. was listed as having prior  
25 felony convictions which included Manufacture/Delivery of a Controlled Substance.

26 Information Regarding Target Telephone 2.

27 83. On January 11, 2023, the Honorable Whatcom County Superior Court  
28 Judge Evan Jones signed a search warrant and court order relating to the real-time

prospective location, pen register and trap and trace, and historical information for TT2. Investigators served the judicial order on the carrier and received records in response. Included in the historical information was some text message content related to TT2. Investigators received text message content that spanned approximately between January 5, 2023, and January 11, 2023. In the text message content, investigators found extensive evidence that the user of TT2, believed to be AHMED, was distributing large quantities of controlled substances.

84. Specifically, investigators saw text messages<sup>4</sup> discussing slang terms for controlled substances, payments, and quantities. Investigators saw the following text message thread, which occurred on January 11, 2023:

Sender	Content
206-635-1192 (TT2)	"Yo how much would you pay for a whole one of them thangs "
206-635-1192 (TT2)	"Like the most "
206-635-1192 (TT2)	"You would pay"
206-635-1192 (TT2)	"Pow "
360-728-7647	"Obviously I paid 900 from you, but that's even too much"
206-635-1192 (TT2)	"The whole whole thing "
360-728-7647	"Oh the elbow?"
206-635-1192 (TT2)	"Whole thang of pow "
206-635-1192 (TT2)	"Brick"
360-728-7647 (TT2)	"I think about 6k if I remember correctly "
360-728-7647	"Oops "
360-728-7647	"I mean like 14ish"

85. Investigators recognized, based on their training and experience, that the above text thread likely involved controlled substances. Investigators recognized the

<sup>4</sup> Investigators do not believe that all text message content sent or received by TT2 was retained by the service provider. Investigators believe it is likely that only a portion of the text message content was captured, meaning conversation threads may be incomplete.

terms “whole one” and “brick” as slang terms that can be used for a kilogram of a controlled substance. Investigators recognized the term “elbow” as a slang term for one pound, referencing the letters “L” and “B”. Investigators also recognized the term “pow” as a slang term that is commonly used for fentanyl-laced powder, and sometimes for cocaine.

86. Investigators believed, based on their training and experience, that the user of TT2, believed to be AHMED, was asking the user of 360-728-7647 what they would be willing to pay for a kilogram of powder, meaning either cocaine or fentanyl-laced powder. The user of 360-728-7647 appears to say they would be willing to pay \$14,000.00 for a whole kilogram.

87. Investigators saw that in records managements systems for both the Bellingham Police Department and the Whatcom County Sheriff’s Office, 360-728-7647 was listed as a contact number for L.P. As previously mentioned, investigators believe they observed L.P. meeting with AHMED while conducting surveillance on December 12, 2022.

88. In another text message sent by TT2 on January 10, 2023, the user of TT2 messaged “Shit chilling charging my car”. Investigators believe AHMED is referencing **TV1**, which is an electric vehicle.

89. Investigators saw messages referencing “Maleek”, which investigators believe is a nickname for MOHAMED, on January 8, 2023:

Sender	Content
206-635-1192 (TT2)	"Hey"
360-845-4830	"What"
206-635-1192 (TT2)	"Where is savy find him for me "
206-635-1192 (TT2)	"He trying to keep 5k cuz he said you jacked him ima just go jack him "
360-845-4830	"I didn't jack him maleek have him the dope for it"
360-845-4830	"So I didn't and I didn't I mean to jack him I fell asleep and was sick In the hospital like legit no bullshit it was around last time I talked to u"

1	360-845-4830	"R u in town"
2	360-845-4830	"I need blues"
3	360-845-4830	"Maleek trying to say he gonna shoot me"
4	206-635-1192 (TT2)	"Please I want to jack him just I find out if you and I got you I ain't going to let him do shit to you ever just work wit me man frfr"
5	360-845-4830	"Ok cool I need blues now I been out"

6  
7 Later in the conversation thread, investigators observed the following:

8	Sender	Content
9	206-635-1192 (TT2)	"Listen find him for us and I'll make your debt clear with maleek"
10	360-845-4830	"I just told u I don't and should not have a debt with him so whatever"
11	360-845-4830	"Make it clear anyways"
12	206-635-1192 (TT2)	"Just play along damn"
13	360-845-4830	"U were supposed to come back and give me pills rember u said u was gonna help me"

14  
15 90. Investigators believed, based on the context of the conversation, that  
16 AHMED was asking the unknown user of 360-845-4830 to find someone named  
17 "Savy". It appeared that there was a disagreement over a \$5000.00 debt, and AHMED  
18 was planning on robbing or collecting the money from "Savy" by force. In the  
19 conversation thread, the user of 360-845-4830 appears to believe that MOHAMED  
20 wants to shoot him over a debt, which AHMED promises to erase if the user is able to  
21 find "Savy" for him. Investigators took note that AHMED used the phrase "find him for  
22 us", indicating the existence of an organizational network.

23 91. I also believe, based on my training and experience, and the facts of this  
24 investigation, that MOHAMED, a/k/a "Maleek", and AHMED, a/k/a "O", were acting  
25 in supervisory roles within a drug trafficking organization, and were using the threat of  
26 violence, or actual violence, to collect debt from their drug re-distributors in Whatcom  
27 County, WA.

28 92. In the text message content obtained from TT2 records, investigators saw  
multiple references to Cash App being used as a payment method. Investigators saw

multiple text messages that indicated “Moe!” had sent the user of TT2 money using Cash App. Investigators were aware that “Moe!” was a Cash App account name used by MOHAMED. Investigators saw that the user of TT2 sent the “Cash Tag” as an outgoing text message as “\$bigbag4900”, quickly followed up by the text “3900”. Investigators believe AMHED was providing his “Cash Tag”, \$bigbag3900, to accept payment from another individual.

January 16, 2023: Seizure of 1,000 fentanyl pills from Natasha PARKHILL (Count 7).

93. On January 16, 2023, investigators were conducting plainclothes surveillance around the Guesthouse Inn in Bellingham, WA. At about 6:40 PM, investigators saw TV2 parked in the parking lot. The vehicle was running. About seven minutes later, investigators saw a blonde female get out of the front passenger seat and walk towards a hotel entrance. TV2 drove to a different parking spot in the same parking lot, and investigators briefly lost a view of TV2. At about 7:03 PM, investigators saw another female with curly hair getting out of the front passenger seat of the vehicle. She walked to a nearby Subaru Forester bearing WA/CFT1155, got in the driver’s seat, and drove from the parking lot. Investigators recognized the Subaru Forester as the same vehicle that had been observed at the Motel 6 on January 10, 2023.

94. Investigators followed the Subaru Forester as it drove on Interstate 5 towards Ferndale, WA. A uniformed WCSO deputy, driving a WCSO patrol vehicle equipped with emergency lights and sirens, attempted to stop the Subaru Forester. The Subaru Forester attempted to flee from the law enforcement vehicle, running a red light as it drove on Main Street in Ferndale, Washington. The Subaru Forester appeared to begin having mechanical problems, and soon came to a stop.

95. Law enforcement watched as the driver, later identified as Natasha PARKHILL, appeared to be rummaging around in the vehicle, possibly concealing items. PARKHILL eventually exited the vehicle, along with a passenger who was identified as J.S.. While J.S. was exiting the vehicle, she placed two cell phones on the top of the Subaru Forester. One of those phones was an iPhone cell phone (Target

1 Device 1 or TD1). Inside the vehicle, law enforcement could observe pieces of tin foil,  
2 a glass pipe, and a small blue pill they recognized as being consistent with a fentanyl-  
3 laced pill.

4 96. PARKHILL was advised of her Miranda warnings. While speaking with  
5 law enforcement, she provided her phone number as 360-319-3611. PARKHILL  
6 identified Target Device 1 as belonging to her and seized it. Law enforcement seized  
7 the vehicle pending the application of a search warrant.

8 97. After PARKHILL was taken into custody, law enforcement saw TV2  
9 drive by the location where the Subaru Forester was stopped in Ferndale, WA.

10 98. On January 18, 2023, the Honorable Whatcom County District Court  
11 Judge Angela Anderson authorized a search warrant for the Subaru Forester. Law  
12 enforcement subsequently searched the vehicle and located approximately 125.6 gross  
13 weight grams (estimated to be more than one thousand pills), in two bags, of suspected  
14 blue “M 30” fentanyl-laced pills. Law enforcement also located about 15.7 gross weight  
15 grams of suspected methamphetamine<sup>5</sup>, as well as \$1,360.00 in US currency. A digital  
16 scale, multiple empty clear plastic baggies, and a suspected drug ledger notebook was  
17 also located in the vehicle. The following is a photo of some of what was located in the  
18 Subaru Forester:

19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

---

<sup>5</sup> The suspected methamphetamine was field tested and showed a presumptive positive result.





99. Investigators reviewed judicially authorized call detail records for MOHAMED's TT1 on January 16, 2023. Investigators saw there had been approximately four telephonic contacts between TT1 and PARKHILL's 360-319-3611 between approximately 5:57 PM and 7:21 PM. Investigators noted there appeared to have been telephonic contact between TT1 and 360-319-3611 even after law enforcement had attempted to stop PARKHILL, but before the vehicle had stopped. Investigators suspected PARKHILL and MOHAMED were in contact with each other as PARKHILL was being stopped, eventually leading to TV2 driving through the area after PARKHILL was detained.

100. Investigators reviewed judicially authorized call detail records for TT1 between November 16, 2022, and January 16, 2023. Investigators saw that had been approximately 761 telephonic contacts with PARKHILL's 360-319-3611 during that time. Investigators saw the two numbers were in consistent contact with each other during that timeframe, and were in contact, or attempted contact, on a nearly daily basis. Investigators also saw there had been telephonic contact, on a much more limited basis, between PARKHILL's 360-319-3611 and AHMED's TT2.

101. PARKHILL was booked into jail after the traffic stop on January 16, 2023, for an outstanding warrant. Investigators reviewed jail phone calls, and heard a



female, suspected to be PARKHILL, making phone calls to a bail bond company. PARKHILL provided the number for MOHAMED's TT1 and the name "Em" to the bail bond company to help with bail money. PARKHILL said "Em" was her boyfriend. The bail bonds employee discussed how someone may use "Cash App" to pay PARKHILL's bail.

102. On January 26, 2023, the Honorable Whatcom County Superior Court Judge Evan Jones approved a search warrant authorizing the search of PARKHILL's cell phone (TD1). Investigators subsequently searched the device.

103. Investigators located significant evidence in the device, including text messages, photographs, social media messages, and financial records indicating PARKHILL was re-distributing large quantities of fentanyl on behalf of MOHAMED, and collecting the financial proceeds.

104. Investigators found PARKHILL had MOHAMED's phone number (TT1) saved under the contact names "MisterBoss", "TrapDaddy", and "TrapDaddie". Investigators saw PARKHILL had AHMED's phone number (TT2) saved under the contact name "O". Investigators also noticed the phone number 206-304-2908 (Target Telephone 3 or TT3). The contact name associated with TT3 was several vehicle emoji's next to the emoji image of a stoplight. Investigators believed, based on the string of emoji images, that it was a coded contact for the name "Traffic". As described later in this Affidavit, investigators believe "Traffic" is an alias for Robel GEBREMEDHIN.

105. Investigators found a message thread between PARKHILL and MOHAMED's TT1. The following are portions of some of those conversations:

Time/Date	Sender	Content
12/24/22 11:05 PM	"TrapDaddie" – TT1	How much total again
12/24/22 11:06 PM	Parkhill - TD1	1600 and I'm sending cash app rn
12/24/22 11:06 PM	"TrapDaddie" – TT1	With the cashapp?
12/24/22 11:07 PM	Parkhill - TD1	No 1600 and 500 cash a app

1 And:

2 Time/Date	Sender	Content
3 12/30/22 1:19 PM	Parkhill - TD1	I'm gonna need some more pow
4 12/30/22 2:06 PM	"TrapDaddie" – TT1	How much do you have love ?
5 12/30/22 2:58 PM	Parkhill - TD1	Money or pow

6 And:

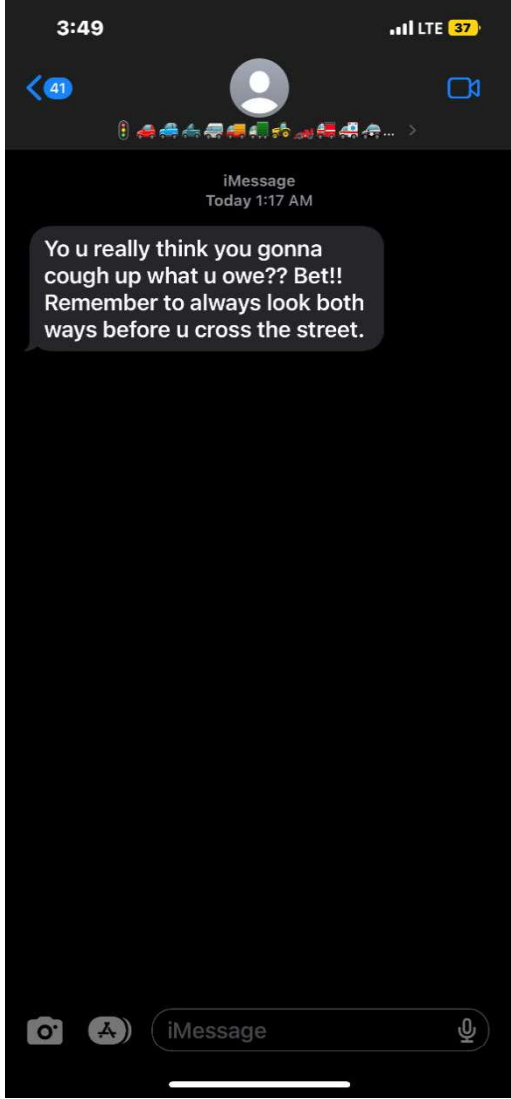
7 Time/Date	Sender	Content
8 1/5/23 4:33 AM	"TrapDaddie" – TT1	You got any cashapp ?
9 1/5/23 4:41 AM	"TrapDaddie" – TT1	Cashapp ?
10 1/5/23 4:43 AM	Parkhill - TD1	I sent 2300 with court

11 And:

12 Time/Date	Sender	Content
13 1/10/23 10:59 AM	"TrapDaddie" – TT1	I'll put the word out
14 1/10/23 10:59 AM	"TrapDaddie" – TT1	How much he owe
15 1/10/23 11:46 AM	Parkhill - TD1	I really dont even want to tell u cuz I 16 shouldnt have even given him the chance to 17 owe that much but if he was smart he would 18 have done what he was supposed to now I 19 know hes a smoker and not about the dollars 20 I just cant do everything and everybody on 21 my own.... But everytime i try to build a 22 team somewhere they smoke up shop or cant 23 stay loyal and take the money to someone 24 else its crazy im trying to take over the world 25 and these guys just wanna get high and stay 26 the same
1/10/23 12:42 PM	"TrapDaddie" – TT1	Call me
1/10/23 12:45 PM	"TrapDaddie" – TT1	How much tell me
1/10/23 12:55 PM	Parkhill - TD1	1500

27 And:

28 Time/Date	Sender	Content
--------------	--------	---------

1	1/11/23 3:49 PM	Parkhill - TD1	Traffic messaged me and keeps calling just so
2			u know if I go missing lol that's where u
3	1/11/23 3:49 PM	"TrapDaddie" – TT1	should start
4	1/11/23 3:49 PM	"TrapDaddie" – TT1	What he sayin send me a screenshot
5			Trust me he doesn't want the issue plus he
6	1/11/23 3:50 PM	Parkhill - TD1	won't step foot here
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25	1/11/23 3:59 PM	"TrapDaddie" – TT1	What do you owe him always ?
26	1/11/23 4:46 PM	Parkhill - TD1	Like 2gs
27	1/11/23 4:50 PM	"TrapDaddie" – TT1	It's good he a pussy he ain't gonna do shit
28	1/11/23 4:50 PM	"TrapDaddie" – TT1	I thought it was a crazy no lol

1	1/11/23 6:02 PM	Parkhill - TD1	Huh
2	1/11/23 6:40 PM	Parkhill - TD1	A crazy
3	1/11/23 7:01 PM	Parkhill - TD1	Hes got a couple black dudes out here looking fir me
4	1/11/23 7:10 PM	“TrapDaddie” – TT1	Bet I got you

5  
6 106. Investigators observed other messages indicating MOHAMED, using  
7 TT1, was acting as PARKHILL’s source of drug supply. In the messages, the two  
8 discussed Cash App, pills, and “pow”, which is often used as a street slang term for  
9 fentanyl-laced powder. It appeared to investigators, based on the context of the  
10 messages, that MOHAMED and PARKHILL had more than a buyer/seller relationship,  
11 and that MOHAMED was directing PARKHILL in her criminal activity.

12 107. Investigators noted that on January 5, 2023, the name “Court” was  
13 referenced, which investigators believe was a reference to C.K., another suspected drug  
14 re-distributor for MOHAMED.

15 108. Investigators also noted that MOHAMED and PARKHILL discussed  
16 “Traffic”, and how PARKHILL owed “Traffic” money. Based on the text message  
17 thread, it appeared that “Traffic” was threatening PARKHILL based upon an  
18 outstanding debt, and PARKHILL believed there were individuals looking for her,  
19 possibly to kidnap her, on behalf of “Traffic”. Investigators understood the conversation  
20 between them to mean that “Traffic” would not dare to show up in Whatcom County,  
21 and that MOHAMED would protect PARKHILL. PARKHILL appeared to indicate that  
22 she owed \$2000.00 to “Traffic”.

23 109. Investigators found evidence that PARKHILL was making significant use  
24 of a Facebook Messenger application on her device to arrange drug transactions.  
25 Investigator saw PARKHILL was logged into the Facebook account named “Natasha  
26 Chung” (hereinafter Target Account 4 or TA4). Investigators saw a multitude of  
27 messages from other Facebook Messenger accounts asking PARKHILL for “day”,  
28 “shards”, “pow”, and “powder”. Investigators recognized these as common slang terms  
for methamphetamine and fentanyl. Investigators saw messages between TA4 and other

1 accounts discussing amounts, meeting locations, and other drug related items.

2 Investigators saw the drug related messages appeared to go into December of 2022.

3 110. Investigators saw a message thread between PARKHILL's TA4 and an  
4 account named "Maleek Moefella" (hereinafter Target Account 2 or TA2). The account  
5 profile picture for TA2 showed the back of a black male whose stature and hairstyle  
6 appeared to match that of Mohamed MOHAMED. Additionally, "Maleek" was a  
7 known alias for MOHAMED. Investigators saw that on January 8, 2023, at 5:11 PM,  
8 PARKHILL's TA4 sent a message to MOHAMED's TA2 saying "Sandy pt". On January  
9 8, 2023, at 9:22 PM, TA2 responded to TA4, saying "Send your location" and "Asap".

10 Investigators saw text messages between MOHAMED's TT1 and PARKHILL's TD1  
11 around that same time where MOHAMED was attempting to meet with PARKHILL.

12 111. Investigators found Facebook Messenger messages between  
13 PARKHILL's TA4 and a Facebook Messenger account named "C.G.". Investigators  
14 observed the profile picture matched the appearance of C.K. When investigators  
15 searched for the same profile at a later date, investigators observed the same profile  
16 photo appeared under the account titled "C.K.". Investigators believed, based on their  
17 knowledge of the Facebook Messenger application, that the account name had been  
18 updated from "C.G." to "C.K.". Investigators saw that a publicly viewable friends list  
19 for MOHAMED's TA2 showed the account was "friends" with only one "Courtney",  
20 which was C.K. (hereinafter Target Account 5 or TA5).

21 112. Investigators saw messages between PARKHILL's TA4 and C.K.'s TA5.  
22 Investigators saw the following exchange (times are approximate):

23 Time/Date	24 Sender	25 Content
26 1/10/23 6:05 PM	27 C.K. (TA5)	28 Audio Call (1 sec)
1/10/23 6:05 PM	PARKHILL (TA4)	Chill im coming
1/10/23 6:05 PM	PARKHILL (TA4)	Its busy as hell an i am making a special trip just for u
1/10/23 7:00 PM	C.K. (TA5)	If u would answer the phone I was trying to tell u I'm mobile

1/10/23 7:00 PM	PARKHILL (TA4)	Ok
1/10/23 7:00 PM	PARKHILL (TA4)	Come to me pls

Investigators saw the following messages later in the same thread:

Time/Date	Sender	Content
1/10/23 9:19 PM	C.K. (TA5)	Hey
1/10/23 9:19 PM	C.K. (TA5)	(Missed audio call)
1/11/23 11:20 AM	PARKHILL (TA4)	Ur rught
1/11/23 11:20 AM	PARKHILL (TA4)	Lots of complaints
1/11/23 11:59 AM	C.K. (TA5)	I knew it
1/11/23 11:59 AM	C.K. (TA5)	Lol

113. Investigators believed, based on their training and experience, that C.K. and PARKHILL, using TA4 and TA5 were discussing meeting for the purpose of obtaining controlled substances. Later in the message thread, investigators suspect C.K. and PARKHILL were discussing the poor quality of the controlled substances they were distributing.

114. Investigators found a text message thread between PARKHILL's TD1 and a contact named "CourtK" (360-468-0223). Investigators suspect "CourtK" was short for C.K. Investigators saw the following message thread:

Time/Date	Sender	Content
1/2/23 12:49 PM	"CourtK": 360-468-0223	Ok Maleek said we're gonna be meeting up in Tulalip
1/2/23 12:50 PM	"CourtK": 360-468-0223	But I have 3 boats sold rn
1/2/23 12:50 PM	Parkhill - TD1	Ya I went down there last night n he never showed
1/2/23 12:50 PM	Parkhill - TD1	Waste of my time

115. Investigators believe, based on their training and experience, that C.K., using phone number 360-468-0223, was discussing meeting with "Maleek" for controlled substances. I know, based on my training and experience, that a "boat" is a slang term often used to reference one thousand fentanyl-laced pills. Investigators

1 believe that when “CourtK” says she has “3 boats sold”, it likely means she has  
2 promised three thousand pills to waiting customers.

3 116. Investigators observed saved Cash App transactions on Natasha  
4 PARKHILL’s cell phone. Investigators saw she was logged into a Cash App account  
5 named “Natasha Parkhill” with the handle (referred to by Cash App as a “Cash Tag”) of  
6 \$parkhillnatasha. Investigators saw that PARKHILL had a balance of \$1,684.04 stored  
7 in her Cash App account. Investigators saw PARKHILL had multiple transactions with  
8 a Cash App account under the name “Moe!” with the Cash Tag \$FellaBabyy206. The  
9 transactions included the following dates:

- 10 • \$500.00 sent to “Moe!” on 11/18/2022
- 11 • \$200.00 sent to “Moe!” on 11/21/2022
- 12 • \$500.00 sent to “Moe!” on 11/22/2022
- 13 • \$300.00 sent to “Moe!” on 11/28/2022
- 14 • \$250.00 sent to “Moe!” on 12/01/2022
- 15 • \$200.00 sent to “Moe!” on 12/04/2022
- 16 • \$500.00 sent to “Moe!” on 12/07/2022
- 17 • \$150.00 sent to “Moe!” on 12/15/2022
- 18 • \$400.00 sent to “Moe!” on 12/22/2022
- 19 • \$500.00 sent to “Moe!” on 12/24/2022
- 20 • \$400.00 sent to “Moe!” on 12/31/2022
- 21 • \$300.00 sent to “Moe!” on 01/01/2023
- 22 • \$1000.00 sent to “Moe!” on 01/03/2023
- 23 • \$800.00 sent to “Moe!” on 01/11/2023

24 117. Investigators know, based on their training and experience, it is a  
25 common money laundering tactic used by drug traffickers to split payments between  
26 online apps and/or money remittance services and bulk cash drop-offs in order to  
27 minimize the quantity of currency being moved through banking platforms, and also to  
28 lower the amounts of paper currency being exchanged in person.

118. Upon a review of location information associated with PARKHILL’s  
TD1, investigators saw that PARKHILL’s cell phone, an iPhone, was sharing its  
physical location with MOHAMED’s.



1 119. Investigators believe, after a review of Natasha PARKHILL's cell phone,  
2 that Natasha PARKHILL and C.K. are drug re-distributors selling fentanyl in Whatcom  
3 County on behalf of MOHAMED. Investigators believe that PARKHILL and C.K. are  
4 sending some of the proceeds of the illicit activity to MOHAMED via Cash App, a  
5 peer-to-peer money transfer application in payment for the controlled substances they  
6 had received. Investigators believe that PARKHILL has also previously sold controlled  
7 substances on behalf of "Traffic", to whom she was indebted to. Investigators believe  
8 MOHAMED, C.K., and PARKHILL had used their Facebook Messenger accounts  
9 (TA2, TA4, and TA5) in furtherance of their drug trafficking activities.

10 January 18, 2023: Seizure of 1,000 fentanyl pills from Matthew ANDERSON (Count 8).

11 120. On December 9, 2022, Bellingham Police Department Officer D'Amelio  
12 conducted a traffic stop on a vehicle in Bellingham, WA for a registration related  
13 offense. The occupants of the vehicle were identified as Matthew ANDERSON and  
14 S.B. During the traffic stop, Officer D'Amelio observed small plastic baggies in the  
15 vehicle, which he recognized as being indicative of drug sales or re-distribution. A  
16 police narcotics detection canine was deployed around the vehicle, and subsequently  
17 alerted to the odor of narcotics in or around the vehicle. While speaking to another  
18 Bellingham Police Department officer, ANDERSON consented to search of his  
19 pockets. A small bag of blue "M 30" stamped suspected fentanyl-laced pills was  
20 located on ANDERSON's person. ANDERSON and S.B. were released. The vehicle  
21 was impounded pending the application of a search warrant.

22 121. Bellingham Police Department officers applied for and were granted a  
23 Washington State warrant for the vehicle. Inside the vehicle, investigators found and  
24 searched a backpack that ANDERSON had been seen accessing during the traffic stop  
25 on December 9, 2022. In the backpack, investigators located, among other evidence,  
26 approximately 476 suspected fentanyl-laced pills and approximately 24 gross weight  
27 grams of suspected methamphetamine. Law enforcement field tested the suspected  
28 methamphetamine and saw a positive result.



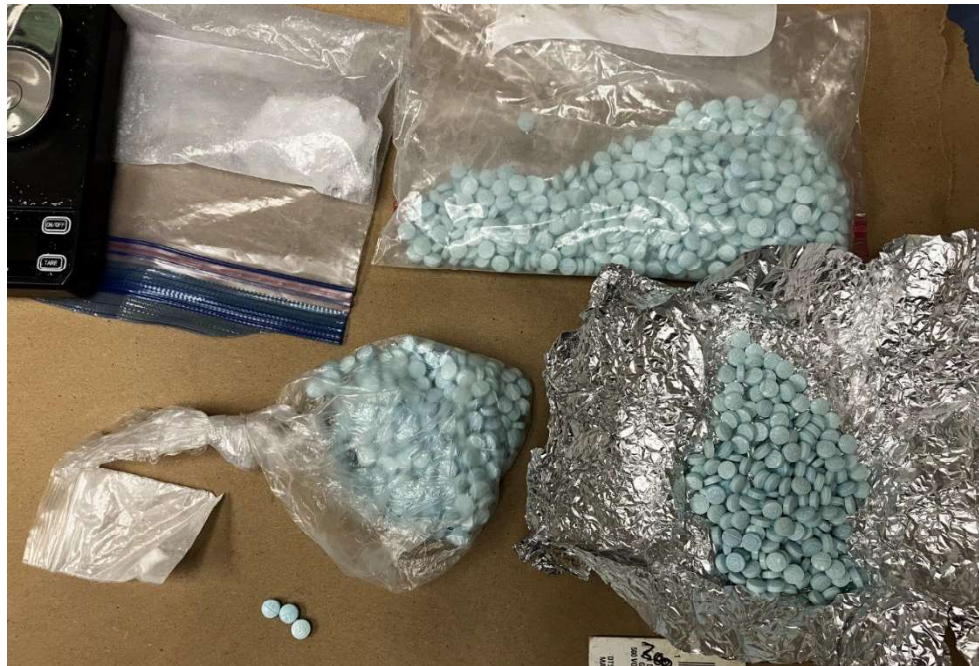
1           122. On January 18, 2023, investigators with the Whatcom Gang and Drug  
2 Task Force and the DEA Bellingham Resident Office were conducting surveillance in  
3 the area of 3710 Meridian Street, Bellingham, WA. Investigators observed Matthew  
4 ANDERSON walking through a hotel parking lot. Investigators were aware that  
5 probable cause existed to arrest Matthew ANDERSON on Washington State charges  
6 relating to the Possession of a Controlled Substance with Intent to Deliver, based on the  
7 December 9, 2022 traffic stop. Investigators watched as ANDERSON leaned into the  
8 passenger door of a car parked in that area and appeared to speak with an occupant.

9           123. Shortly after, ANDERSON walked to another nearby vehicle, and got  
10 into the front passenger seat. Investigators conducted a query of the license plate, and  
11 saw the registered owner, K.Q., had drug related history in Whatcom County, WA.  
12 After several minutes, ANDERSON walked away from the vehicle, and the vehicle left.  
13 While observing ANDERSON, investigators watched as he tucked or concealed a bag  
14 into his pants.

15           124. Investigators continued to watch ANDERSON as he walked into a nearby  
16 clothing store and appeared to meet with another female inside the store. Investigators  
17 believed, based on their training and experience, that ANDERSON was conducting  
18 hand-to-hand drug transactions.

19           125. A uniformed Whatcom County Sheriff's Office deputy approached  
20 ANDERSON as he was getting into another vehicle in an adjacent parking lot.  
21 ANDERSON was detained in handcuffs and was advised of the Miranda warnings.

22           126. ANDERSON voluntarily allowed law enforcement to search a bag that  
23 ANDERSON had been carrying prior to being contacted by law enforcement. In the  
24 bag, law enforcement located a digital scale, over one thousand blue "M 30" stamped  
25 fentanyl-laced pills, approximately 20.0 gross weight grams of suspected  
26 methamphetamine, and a small amount of suspected fentanyl-laced powder. The  
27 following is an image of some of what was located and seized from ANDERSON on  
28 January 18, 2023:



127. ANDERSON had a cell phone in his possession when he was contacted. Investigators spoke to ANDERSON about the phone, and ANDERSON signed a written consent form allowing investigators to copy and search the device.

128. ANDERSON admitted to law enforcement that he had just sold twenty pills to a female inside of a nearby clothing store. ANDERSON told law enforcement he had been attempting to sell additional pills when he had been contacted and detained. ANDERSON was not booked into jail at that time and was released pending further investigation.

129. Investigators subsequently reviewed the contents of the device and found evidence of drug trafficking. Investigators found a saved contact named "Maleek" with the contact number 206-759-0635 (TT1). Investigators found a saved contact named "O" with the contact number 206-635-1192 (TT2). Investigators found a saved contact named "Traffic" with the contact number 206-304-2908 (TT3).

130. Investigators saw text messages between ANDERSON's phone and many other cell phone users, where individuals were asking ANDERSON for "day", "wakeup", "powder", and "blues", which I recognized, based on my training and

1 experience, as slang terms for methamphetamine, fentanyl-laced pills, and fentanyl-  
2 laced powder.

3 131. Investigators saw several messages between a contact named “O”, using  
4 TT2, and ANDERSON. On January 13, 2023, ANDERSON messaged AHMED’s TT2  
5 saying “I need to meet up with you”.

6 132. Investigators found a message thread between ANDERSON and  
7 “Maleek”, believed to be MOHAMED, using TT1. Investigators saw that on January  
8 14, 2023, MOHAMED had sent ANDERSON a text which read “\$Fellababy206”,  
9 which investigators recognized as MOHAMED’s Cash App handle. Investigators saw  
10 that shortly after ANDERSON received the Cash App handle, ANDERSON then sent  
11 the same Cash App handle to at least two other individuals. Investigators suspect  
12 ANDERSON was using Cash App to collect payment on behalf of MOHAMED from  
13 other individuals.

14 133. Investigators observed a text message exchange from January 13, 2023,  
15 which appeared as follows:

16 Time/Date	17 Sender	18 Content
1/13/23 7:04 AM	Matthew ANDERSON	Can you take care of me now?
1/13/23 7:39 AM	MOHAMED (TT1)	Yes way
1/13/23 7:39 AM	MOHAMED (TT1)	I’m up

20 134. Investigators recognized the phrase “I’m up” to mean that either  
21 MOHAMED was awake, or that MOHAMED had a supply of drugs that he was able to  
22 sell or give to ANDERSON. Investigators knew the term “up” could be a slang term  
23 sometimes used by drug suppliers that meant they had a supply of drugs to sell.

24 135. Investigators saw pictures saved to ANDERSON’s device depicting piles  
25 of what appeared to be thousands of blue “M 30” stamped pills.

26 136. Investigators saw that ANDERSON was logged onto a Facebook  
27 Messenger account titled “Matthew Anderson” (Target Account 3 or TA3). Based upon  
28 a review of some of the messages saved to the account, it appeared that ANDERSON

1 was using the account to contact his drug customers and arrange drug sales.  
 2 Investigators observed messages from ANDERSON's TA3 where he offered "powder  
 3 and clear" to another Facebook Messenger user on December 24, 2022. Investigators  
 4 observed additional messages in early December 2022 indicating ANDERSON had  
 5 been using the account to communicate with drug customers and/or re-distributors.

6 137. Investigators found a message thread on ANDERSON's device between  
 7 ANDERSON's TA3 and a Facebook account under the name "Obsa Ahmed"  
 8 (Hereinafter referred to as Target Account 1 or TA1). Investigators later conducted an  
 9 open-source online search of that profile, and observed publicly viewable photos on  
 10 TA1 that appeared to match Ahbdurman AHMED. Investigators observed the following  
 11 messages between ANDERSON's TA3 and AHMED's TA1 (Times are approximate):

Time/Date	Sender	Content
12/31/22 8:58 PM	ANDERSON (TA3)	Hey what's up man
12/31/22 8:58 PM	ANDERSON (TA3)	Did everything go thrugh
12/31/22 8:58 PM	AHMED (TA1)	I need a ride to get the car
12/31/22 8:58 PM	AHMED (TA1)	Audio Call (55 secs)
12/31/22 9:11 PM	ANDERSON (TA3)	There is thrirty one bucks
12/31/22 9:11 PM	ANDERSON (TA3)	That would cover Uber
12/31/22 9:11 PM	AHMED (TA1)	Yeah shoot u
1/1/23 12:04 AM	AHMED (TA1)	Missed audio call
1/1/23 12:04 AM	AHMED (TA1)	Find Danny for me asap bro
1/1/23 12:04 AM	AHMED (TA1)	Frfr
1/1/23 12:52 AM	ANDERSON (TA3)	K
1/1/23 12:52 AM	ANDERSON (TA3)	Where you at
1/1/23 12:52 AM	ANDERSON (TA3)	Audio Call (3 mins)
1/1/23 3:53 AM	ANDERSON (TA3)	Audio Call
1/1/23 4:33 AM	ANDERSON (TA3)	Audio Call
1/1/23 1:00 PM	AHMED (TA1)	Missed audio call
1/1/23 1:01 PM	AHMED (TA1)	Missed audio call

1	1/4/23 11:59 AM	ANDERSON (TA3)	Audio Call (33 secs)
2	1/6/23 11:25 AM	ANDERSON (TA3)	Hey what's up man? How are you?
3	1/6/23 11:25 AM	ANDERSON (TA3)	You alright
4	1/6/23 11:25 AM	AHMED (TA1)	Yea
5	1/6/23 11:25 AM	AHMED (TA1)	You good
6	1/6/23 11:25 AM	AHMED (TA1)	Bro
7	1/6/23 11:25 AM	AHMED (TA1)	I heard I'm hot out there I don't know why but
8	1/6/23 11:25 AM	AHMED (TA1)	I need to talk to you
9	1/6/23 11:54 AM	ANDERSON (TA3)	I'm at the six
10	1/6/23 11:54 AM	ANDERSON (TA3)	Il call you
11	1/7/23 8:31 PM	ANDERSON (TA3)	Hey
12	1/12/23 7:45 AM	ANDERSON (TA3)	Hey what up are you still in 215? I'm in 216 right next to it FYI. Also if you need the room cleaned Sara with me and she has her cleaning stuff
15	1/12/23 7:45 AM	ANDERSON (TA3)	Did You ever hear anything on the payment for the room? I promise you I paid it
17	1/13/23 5:53 AM	ANDERSON (TA3)	Hey man where abouts are ya?

138. Investigators found several messages of interest in the conversation thread between TA1 and TA3. It appeared to investigators that ANDERSON was assisting AHMED in his drug trafficking activities in the Whatcom County area, acting as a facilitator. Based on the messages, it appeared that ANDERSON was arranging rides for AHMED, locating people, paying for hotel rooms, and even cleaning rooms for AHMED.

139. Investigators took interest in the message sent from TA1 to TA3 on January 6, 2023, that said "I heard I'm hot out there I don't know why but". Investigators believed, based on their training and experience, that "hot" likely meant AHMED believed he had attracted the attention of law enforcement.



140. Investigators looked at the Facebook profile for Obsa AHMED (TA1) accessible through ANDERSON's cell phone. Investigators observed the following post, which had been posted by AHMED on November 20, 2022:



141. Investigators saw the male in the photo, who appeared to be AMHED, was posing with two large stacks of US currency, with what appeared to be a passport on top of one of the piles of money.

142. Investigators found ANDERSON was logged into a Cash App account on his device. The name on the Cash App account was "Matthew Anderson" with a Cash Tag of "\$Cmajr1234". Investigators saw that under a "Favorites" section of the app, the Cash App accounts for Moe!/\$FellaBabyy206 and Obsa Ahmed/\$bigbag3900 were listed. Investigators saw a significant number of Cash App transactions between them. Investigators also saw ANDERSON had conducted transactions with a Cash App account named "Traffice" with the Cash Tag \$Upnup44. The following are some of the Cash App transactions that were observed in ANDERSON's device. Investigators noted



1 that ANDERSON had included comments with some of the financial transactions,  
 2 which appeared to be consistent with drug ledger information:

- 3 • \$645.00 sent to "Traffice" on 5/10/2022
  - 4 ▪ Comment: "For gift"
- 5 • \$1.00 sent to "Traffice" on 5/24/2022
  - 6 ▪ Comment: "For Zed is MIA w/ 900 goin 2 u 3609321279"
- 7 • \$80.00 sent to "Obsa Ahmed" on 6/30/2022
  - 8 ▪ Comment: "For gift"
- 9 • \$20.00 sent to "Obsa Ahmed" on 6/30/2022
  - 10 ▪ Comment: "For gift 2"
- 11 • \$40.00 sent to "Obsa Ahmed" on 7/21/2022
  - 12 ▪ Comment: "For gift"
- 13 • \$100.00 sent to "Obsa Ahmed" on 7/22/2022
  - 14 ▪ Comment: "For gift"
- 15 • \$60.00 sent to "Obsa Ahmed" on 7/22/2022
  - 16 ▪ Comment: "For gift"
- 17 • \$791.00 sent to "Obsa Ahmed" on 7/24/2022
  - 18 ▪ Comment: "For gift"
- 19 • \$60.00 sent to "Obsa Ahmed" on 8/2/2022
  - 20 ▪ Comment: "For gift"
- 21 • \$150.00 sent to "Obsa Ahmed" on 8/3/2022
  - 22 ▪ Comment: "For gift"
- 23 • \$30.00 sent to "Obsa Ahmed" on 8/9/2022
  - 24 ▪ Comment: "For 770+30 gift"
- 25 • \$350.00 sent to "Obsa Ahmed" on 8/16/2022
  - 26 ▪ Comment: "For 350 gift5"
- 27 • \$130.00 sent to "Obsa Ahmed" on 8/17/2022
  - 28 ▪ Comment: "For \$350+130 for 480 of 9"
- \$20.00 sent to "Obsa Ahmed" on 8/24/2022
  - Comment: "For gift"
- \$248.00 sent to "Obsa Ahmed" on 8/26/2022
  - Comment: For gift mnowe 18"
- \$80.00 sent to "Obsa Ahmed" on 8/29/2022
- \$134.00 sent to "Obsa Ahmed" on 9/1/2022
  - Comment: "For MA"
- \$110.00 sent to "Obsa Ahmed" on 10/4/2022
- \$499.00 sent to "Obsa Ahmed" on 10/5/2022
  - Comment: "For gift from m"
- \$140.00 sent to "Obsa Ahmed" on 10/6/2022
  - Comment: "For gift"
- \$85.00 sent to "Moe!" on 11/7/2022
  - Comment: "For m"
- \$180.00 sent to "Moe!" on 11/8/2022

- Comment: “For giry”
- \$500.00 sent to “Moe!” on 11/9/2022
  - Comment: “For 2”
- \$35.00 sent to Obsa Ahmed” on 11/21/2022
  - Comment: “For gift”
- \$250.00 sent to “Obsa Ahmed” on 11/23/2022
  - Comment: “For gift”
- \$40.00 sent to “Obsa Ahmed” on 11/23/2022
  - Comment: “For gift”
- \$340.00 sent to “Obsa Ahmed” on 11/24/2022
  - Comment: “For gift”
- \$473.00 sent to “Obsa Ahmed” on 11/26/2022
  - Comment: “For gift”
- \$170.00 sent to “Obsa Ahmed” on 11/29/2022
  - Comment: “For gift plus 100 n 185 - -455”
- \$450.00 sent to “Moe!” on 11/30/2022
  - Comment: “For gift”
- \$700.00 sent to “Moe” on 12/7/2022
  - Comment: “For gift”
- \$300.00 sent to “Moe!” on 12/7/2022
  - Comment: “For gift”
- \$428.00 sent to “Obsa Ahmed” on 12/7/2022
  - Comment: “For gift”
- \$1,100.00 sent to “Obsa Ahmed” on 12/11/2022
  - Comment: “For gift”
- \$150.00 sent to “Obsa Ahmed” on 12/13/2022
  - Comment: “For gift 150 350 – 500”
- \$320.00 sent to “Obsa Ahmed” on 12/17/2022
  - Comment: “For gift more to come”
- \$50.00 sent to “Moe!” on 12/19/2022
  - Comment: “For gift 50 +175 225”
- \$30.00 sent to “Obsa Ahmed” on 12/31/2022
  - Comment: “For gift”
- \$500.00 sent to “Moe!” on 1/5/2023
  - Comment: “For gift”
- \$100.00 sent to “Moe!” on 1/9/2023
  - Comment: “For gift”
- \$100.00 sent to “Obsa Ahmed” on 1/15/2023
  - Comment: “For gift”

143. I believed, based on my training and experience, that ANDERSON was using his Cash App account to launder the proceeds of drug trafficking. Investigators saw that there had been transactions in May of 2022 with the account named “Trafficc”.

1 In one of the comments, investigators saw ANDERSON had mentioned “Zed”.  
2 Investigators saw records in ANDERSON’s Cash App account of transactions, or  
3 attempted transactions, with accounts under the name of “S.J” and “B.J.”. Investigators  
4 were aware that “Zed” was a nickname for B.J.

5 144. Investigators were familiar with S.J and B.J., as they were arrested in  
6 2020 as co-conspirators following a Whatcom Gang and Drug Task Force investigation  
7 that connected S.J and B.J. to the fentanyl-related overdose of a 31-year-old victim in  
8 Whatcom County, WA. B.J. was arrested again in 2022 in connection to a separate  
9 Whatcom Gang and Drug Task Force investigation for Possession with Intent to  
10 Deliver – Fentanyl and Methamphetamine. S.J. was arrested in connection to a  
11 Whatcom Gang and Drug Task Force investigation for Possession of a Controlled  
12 Substance with Intent to Deliver – Cocaine in November of 2022.

13 145. Investigators believe that ANDERSON is using the code of “gift” or  
14 “gifts” for controlled substances.

15 Additional Information related to AHMED’s Facebook Account (TA1).

16 146. Investigators conducted an open-source internet search for AHMED’s  
17 Facebook profile. Investigators found TA1 to be publicly viewable. Investigators saw  
18 there were several photos of a male matching the description of AHMED posing with  
19 large quantities of US currency. Investigators saw the following photos, which had been  
20 posted to TA1 on December 2, 2022, and December 9, 2022:

21 //

22 //

23 //



147. Investigators noted that AHMED appeared to regularly post photos and videos to TA1's publicly viewable Facebook "Story". I know, based on my training and experience, that the "story" function of Facebook are temporarily viewable photos or videos posted by the user of an account.

148. Investigators saw that there had been a video posted on approximately January 17, 2023. In a caption in the video, the user of TA1 had written "My cash app is \$bigbag3900 let's see who fuck wit me frfr".

149. Additionally, investigators saw Facebook "story" videos of what appeared to be a newer construction high-rise apartment complex with a view of the Seattle waterfront. Based on the video content, it appeared AHMED lived at that location. Investigators looked at real-time location data for TT2, and saw it was in the area of the Seattle waterfront. On January 24, 2023, investigators went to the area of the Joseph Arnold Lofts at 62 Cedar Street, Seattle, WA. Investigators watched as AHMED walked into the apartment complex entrance, and then observed AHMED in a fourth-floor apartment through a window, which was viewable from the street.

### Information regarding Target Telephone 3.

150. On February 4, 2023, the Honorable Whatcom County Superior Court Judge Evan Jones approved a search warrant and court order relating to the real time

1 location information, the use of a pen register and trap and trace, and historical  
2 information regarding Target Telephone 3 (subsequently associated with Robel  
3 GEBREMEDHIN). The search warrant and order was subsequently served on AT&T,  
4 and investigators received information in return. The activation date was listed as July  
5 22, 2022.

6 151. The historical cellular location data associated with TT3 included the  
7 timeframe of January 1, 2023, through February 4, 2023. As a general trend,  
8 investigators saw that the device spent a majority of its time in the Burien, WA and  
9 greater Seattle, WA area. During that timeframe, investigators saw that TT3 had  
10 appeared to make approximately four different trips to the Whatcom County, WA area.  
11 Each of these trips lasted between approximately three to nine hours before returning to  
12 the Seattle, WA area. Investigators believed this pattern was indicative of drug  
13 trafficking in Whatcom County, WA.

14 152. Investigators also observed that on January 26, 2023, the device  
15 associated with TT3 had travelled to the area of Vancouver, WA near the southern  
16 border between Oregon and Washington. The device had returned to the Seattle, WA  
17 area on January 27, 2023.

18 Information regarding Robel GEBREMEDHIN, also known as "Traffic".

19 153. While monitoring real-time location information related to TT3,  
20 investigators began to suspect the user "Traffic" was an alias for Robel  
21 GEBREMEDHIN.

22 154. During October of 2022, the Whatcom Gang and Drug Task Force had  
23 assisted the Bellingham Police Department with a drug-related robbery and homicide  
24 investigation. During the course of that investigation, a male identified has D.P. had  
25 been arrested as an accomplice for his suspected role in a drug-related robbery and  
26 subsequent shooting. The vehicle driven by D.P. during that incident was a black Range  
27 Rover. A records check had shown that the Range Rover had been registered to Robel  
28 GEBREMEDHIN. On November 3, 2022, D.P. had made a recorded phone call from

1 the Whatcom County Jail, asking for the phone number for “Traffic”. He was provided  
2 the phone number for TT3.

3 155. Investigators noted that on January 25, 2023, GEBREMEDHIN had listed  
4 his residential address with the Washington State Department of Licensing as 15045 5<sup>th</sup>  
5 Ave SW, Unit 337, Burien, WA (**Target Location 1**). While monitoring judicially  
6 authorized real-time location information for TT3, investigators saw TT3 appeared to  
7 spend a significant amount of time in the general vicinity of that address in Burien,  
8 WA.

9 156. Investigators also located a Facebook social media profile under the name  
10 “Rob Bwoi”, which had open-source pictures that matched the description of  
11 GEBREMEDHIN. The profile under the name “Rob Bwoi” was listed as being  
12 “friends” with AHMED’s TA1.

13 February 26, 2023: Seizure of 15,000 fentanyl pills and a handgun from Robel Sisay  
14 GEBREMEDHIN (Count 9, 10, & 11).

15 157. On February 26, 2023, investigators were monitoring judicially  
16 authorized real-time location data associated with TT3. At about 8:38 PM on February  
17 26, 2023, investigators saw that location information associated with TT3 showed it  
18 was moving northbound into the area of Whatcom County, WA. Investigators  
19 responded to the area of Bellingham, WA to attempt to locate the user of the device.

20 158. Between approximately 9:08 PM and 9:53 PM, investigators observed  
21 judicially authorized pen register and trap and trace information related to TT3.  
22 Between that timeframe, investigators saw multiple incoming and outgoing telephonic  
23 contacts between TT3 and 360-966-1206. This number was recorded in a Whatcom  
24 County Sheriff’s Office records database as belonging to B.M., who was known to  
25 investigators as involved in drug circles in Whatcom County, WA. Investigators  
26 believed, based on their training and experience, that the pattern of telephonic contact  
27 was indicative of arranging a drug transaction.

28 159. At about 10:09 PM, investigators observed a location update for TT3  
indicating it was in the general area of the Slo Pitch Casino (3720 Meridian Street,



1 Bellingham, WA) with an accuracy of about 246 meters. Investigators went to that area.  
2 Shortly after arriving, investigators observed a male matching the appearance of  
3 GEBREMEDHIN walking from the east side of the Slo Pitch Casino and get into the  
4 driver's seat of a black Cadillac Escalade bearing WA/BMA8616 (**Target Vehicle 5** or  
5 **TV5**). Law enforcement queried records for that license plate, and saw it was registered  
6 to Fuad Mohamed ABDULLAHI at 3011 S Warner Street, Tacoma, WA.

7 160. The black Cadillac (**TV5**) left the parking lot shortly after  
8 GEBREMEDHIN got into the driver's seat. Investigators followed the vehicle. The  
9 Cadillac (**TV5**) drove from the parking lot, eventually turning onto McLeod Street in  
10 the area of Telegraph Road.

11 161. The street that **TV5** turned on to was not a through street, and  
12 investigators were aware it was a dead end. The road accessed the rear entrance to a  
13 retirement community apartment complex, as well as a closed storage facility business.  
14 Investigators suspected GEBREMEDHIN had chosen to drive to that location as it was  
15 out of the view and not frequently visited at that time of night.

16 162. Investigators waited for several minutes before following  
17 GEBREMEDHIN to the dead end of McLeod Road. During that time, investigators  
18 observed another sedan drive out of view to the same area. Investigators drove to the  
19 dead end of McLeod Road and observed **TV5** idling along the side of the road. There  
20 was a sedan parked behind the vehicle, and an SUV parked in front.

21 163. Uniformed Whatcom County Sheriff's Office deputies in marked patrol  
22 vehicles arrived in the area. Upon arrival, law enforcement observed **TV5** parked along  
23 the side of the street. GEBREMEDIN was seated in the driver's seat, and a female later  
24 identified as F.B. was seated in the front passenger seat.

25 164. A Chevrolet Trailblazer bearing WA/CEN2037 was parked along the  
26 street, positioned in front of the Cadillac. Law enforcement saw a male seated in the  
27 front passenger seat, later identified as C.B. Law enforcement saw a female seated in a  
28 rear passenger seat, later identified as J.P.

1           165. Behind **TV5**, a Nissan Altima bearing WA/AXD2882 was parked. It was  
2 occupied by a female later identified as B.M.

3           166. Marked law enforcement patrol vehicles activated their emergency  
4 equipment to signal to GEBREMEDHIN. WCSO Sergeant Nyhus called for  
5 GEBREMEDHIN to walk to the patrol vehicles. GEBREMEDHIN got out of **TV5** and  
6 walked to law enforcement. GEBREMEDHIN was detained in handcuffs. As he was  
7 being detained, GEBREMEDHIN said he didn't know the people around him.

8           167. Law enforcement approached the Chevrolet Trailblazer and asked the  
9 occupants to step out. Law enforcement conducted a weapons frisk of C.B. and J.P.  
10 after they stepped out of the Chevrolet Trailblazer. C.B. was wearing two satchels  
11 around his chest when he stepped out of the vehicle. Law enforcement asked if they  
12 could remove the bags from C.B.'s person, and he agreed. C.B. said the bags contained  
13 personal property. These bags were eventually placed back inside of the Chevrolet  
14 Trailblazer. Law enforcement spoke with C.B. and J.P. outside of the vehicle.

15           168. Law enforcement asked F.B. to step out of **TV5**. Law enforcement  
16 conducted a weapons frisk of F.B. and observed a butane torch in her pocket. She was  
17 placed in handcuffs. F.B. stated she was seeing a friend who had just gotten off of the  
18 freeway.

19           169. Whatcom County Sheriff's Office Sergeant Nyhus spoke with F.B., who  
20 had been detained in handcuffs. F.B. said she was there to meet "him", referencing  
21 GEBREMEDHIN. F.B. indicated that she was the driver of the Chevrolet Trailblazer.  
22 Sergeant Nyhus asked if F.B. had anything illegal in her vehicle, and she said she had a  
23 "meth bong" inside the Trailblazer. F.B. would not allow law enforcement to search the  
24 vehicle. Law enforcement observed a glass pipe in open view in the vehicle that was  
25 consistent with a methamphetamine pipe.

26           170. Law enforcement contacted B.M. in driver's seat of the Nissan Altima. As  
27 they approached the vehicle, they observed suspected drug paraphernalia in open view  
28 inside of the vehicle. B.M. was detained in handcuffs. B.M. provided consent to search

1 her vehicle. B.M. said she had dropped her cousin off in the area, and he may have left  
2 some drugs inside. B.M. provided consent to search her vehicle. Deputies searched the  
3 vehicle and located a small quantity of suspected methamphetamine. B.M. eventually  
4 told a deputy she had brought her cousin to that location to purchase drugs from the  
5 occupant of **TV5**.

6 171. GEBREMEDHIN was advised of the Miranda warnings.  
7 GEBREMEDHIN said he was from Seattle. GEBREMEDHIN said there was not  
8 anything illegal in his vehicle. When asked how he knew the other people,  
9 GEBREMEDHIN gave an off-topic response, saying he drove trucks, and just started  
10 doing real estate. GEBREMEDHIN said he was trying to buy flooring and toilets  
11 through someone he met through an online buy/sell website. GEBREMEDHIN said he  
12 didn't know the other people, other than the female in his passenger seat.  
13 GEBREMEDHIN said he knew B.M. through a friend. When asked why they were  
14 meeting, GEBREMEDHIN changed the subject instead of answering.

15 172. Bellingham Police Department Canine Officer Bean assisted with his  
16 narcotics detection canine partner Prowl. BPD Canine Prowl was deployed around **TV5**  
17 and the Nissan Altima (WA/AXD2882). Canine Prowl alerted to the odor of narcotics  
18 in or around those two vehicles. The narcotics detection canine was not deployed<sup>6</sup>  
19 around the Chevrolet Trailblazer based upon F.B's statements, the circumstances of the  
20 contact, and the suspected drug paraphernalia in open view to law enforcement inside  
21 of the vehicle.

22  
23  
24  
25  
26 <sup>6</sup> While giving telephonic testimony to the Honorable Whatcom County Superior Court Judge Evan Jones in  
27 support of a Washington State search warrant for the two vehicles, *Search Warrant 22A33477 (12)*, your Affiant  
28 incorrectly believed a narcotics detection canine had been deployed around the Chevrolet Trailblazer and had  
displayed a positive canine alert. Following the issuance of the search warrant and search of the vehicle, your  
Affiant realized the factual error. An amended testimony was provided to the Honorable Whatcom County  
Superior Court Judge Evan Jones, who indicated the finding of probable cause to search the vehicle was  
unchanged.

1 173. Law enforcement elected to seize the Cadillac Escalade and the Chevrolet  
2 Trailblazer pending the application of a search warrant. All individuals, including  
3 GEBREMEDHIN, were released.

4 174. As GEBREMEDHIN was being released, he told law enforcement his  
5 phone was in his vehicle. GEBREMEDHIN confirmed he still lived in Burien, WA.  
6 Law enforcement asked for GEBREMEDHIN's phone number, which he declined to  
7 provide.

8 175. The Cadillac Escalade (TV5) and Chevrolet Trailblazer were towed to a  
9 Whatcom County Evidence Facility pending the application of a search warrant. They  
10 were supervised by law enforcement during that time. Investigators noted that the real-  
11 time location information for TT3 appeared to be mirroring the general movements of  
12 TV5, indicating to investigators the cell phone associated with TT3 was likely inside of  
13 the vehicle.

14 176. On February 27, 2023, at about 12:48 AM, the Honorable Whatcom  
15 County Superior Court Judge Evan Jones approved a search warrant, *Search Warrant*  
16 *22A33477 (12)*, authorizing the search of TV5 and the Chevrolet Trailblazer.  
17 Investigators searched the vehicles shortly after the search warrant was authorized.

18 177. In the Chevrolet Trailblazer, investigators located approximately 168  
19 gross weight grams of suspected fentanyl-laced pills, approximately 28 grams of  
20 unknown white powder, and approximately 23 gross weight grams of suspected  
21 methamphetamine. The suspected drugs were packaged in multiple baggies. Based on  
22 weight and visual estimation, law enforcement guessed there were more than one  
23 thousand suspected fentanyl-laced pills located in the Chevrolet Trailblazer.

24 178. Based on identity documents, their location in the vehicle, and physical  
25 observations by law enforcement, it appeared F.B., J.P., and M.B. could each be  
26 attributed with some of the suspected controlled substances. Law enforcement located a  
27 significant quantity of empty baggies, suspected controlled substances packaged in  
28 multiple packages, and at least three digital scales. Investigators believed, based on the

1 observed evidence, that F.B., J.P., and M.B. were involved in the distribution of  
2 controlled substances.

3 179. Investigators searched **TV5** pursuant to the search warrant and located  
4 two iPhone cell phones stacked on top of each other setting on the center console arm-  
5 rest. They both appeared to be a similar model and color of iPhone. One iPhone had a  
6 blue case (Target Device 2) and the other had a case with an Apple logo sticker (Target  
7 Device 3). Investigators were aware, based on their training and experience, that it is  
8 common for drug traffickers to use and possess multiple cell phones.

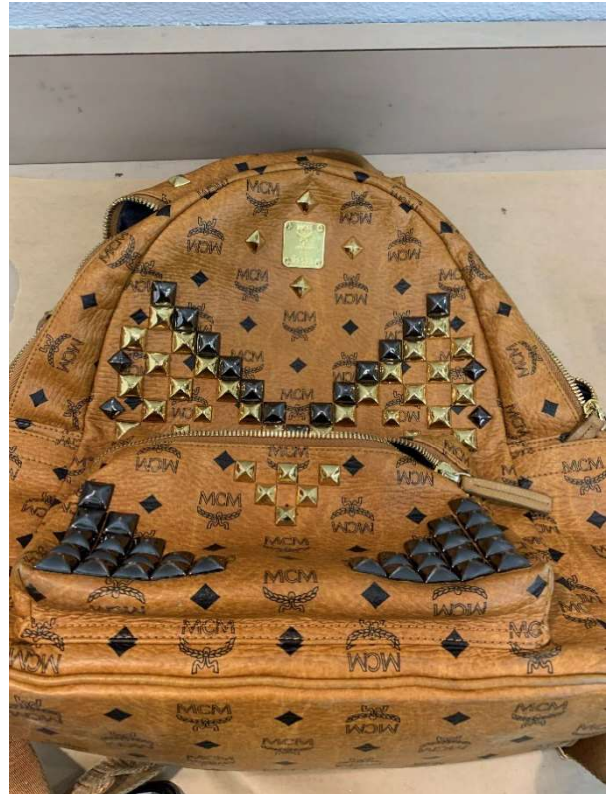
9 180. In the back-seat area, tucked behind the front passenger seat, investigators  
10 located a tan backpack. In the bag investigators located evidence including a EBT card  
11 in the name of Lawrence Griffin, two digital scales, rubber gloves, several boxes of  
12 empty sandwich bags, an empty bank envelope, a Ruger .45 caliber semi-automatic  
13 handgun, and ten sandwich sized bags containing blue "M 30" stamped suspected  
14 fentanyl-laced pills. Investigators later weighed the suspected fentanyl-laced pills, and  
15 found they weighed approximately 1.6 gross weight kilograms. Investigators estimated,  
16 by weight, that there was likely more than 15,000 suspected fentanyl-laced pills located  
17 in the backpack. The following are photos taken during the search of the interior and  
18 exterior of the tan backpack where the suspected fentanyl-laced pills, firearm, scales,  
19 and other evidence were located:

20 //

21 //

22 //





181. Investigators conducted a check of the Ruger handgun's serial number, 672-37902, through law enforcement databases, and found it had been listed as stolen by the Bellingham Police Department in the year 2019. When clearing the firearm, investigators noted there was a cartridge in the chamber of the weapon, as well as a loaded magazine. The following is an image of some of the items seized by law enforcement from TV5:





1           182. While searching **TV5**, investigators noted damage to the rear of the  
2 vehicle. Investigators saw there was a hole, consistent with damage from a projectile  
3 similar to a bullet, through the rear tailgate and interior plastic liner. Investigators noted  
4 the glass windshield appeared to be chipped, as if a projectile had travelled through the  
5 vehicle and struck the windshield on the inside. Investigators suspected **TV5** had been  
6 shot with a firearm at some point in time.

7           183. Your Affiant later communicated with a certified Bureau of Alcohol,  
8 Tobacco, Firearms and Explosives (ATF) interstate nexus expert regarding the Ruger  
9 handgun seized on that date. The ATF interstate nexus expert was provided a  
10 description and photograph of the Ruger .45 caliber handgun located in a vehicle. The  
11 ATF interstate nexus expert advised the firearm was not manufactured in the State of  
12 Washington and thus traveled in interstate or foreign commerce prior to being seized on  
13 February 26, 2023.

14 Reactivation of TT3.

15           184. Around the time investigators located the two cell phones in **TV5** while  
16 serving the search warrant, investigators placed the devices on "Airplane Mode" for the  
17 preservation of evidence. Investigators noticed that location information for TT3  
18 stopped being returned by AT&T at around that same time. On March 1, 2023,  
19 investigators noted that real-time location information related to TT3 resumed again.  
20 Investigators believed, based on their training and experience, that GEBREMEDHIN  
21 had likely obtained a new cell phone, but kept the same phone number (TT3).  
22 Investigators noticed that the location information showed TT3 appeared to spend a  
23 majority of its time in the general area of 15045 5th Ave SW, Burien, WA (Target  
24 Location 1).

25 Information received from The Maverick Apartments regarding **Target Location 1.**

26           185. On March 8, 2023, investigators served an administrative subpoena for  
27 records on The Maverick Apartments, located at 15045 5th Ave SW, Burien, WA.  
28 While serving the administrative subpoena, investigators observed the same black

1 Cadillac Escalade bearing WA/BMA8616 (TV5) parked along the street next to The  
2 Maverick Apartments. A check through the Washington State Department of Licensing  
3 showed TV5 had been listed as sold to “Robel Sisay Gebremedhin” at 15045 5th Ave  
4 SW, Unit 337, Burien, WA (**Target Location 1**) as of February 21, 2023.

5 186. In the following days, investigators received information from a property  
6 manager employed by The Maverick Apartments located at 15045 5th Ave SW, Burien,  
7 WA.

8 187. The building manager told investigators that Robel GEBREMEDHIN was  
9 listed as being the renter for apartment number 337 (**Target Location 1**) and had rented  
10 that apartment since January 31, 2022. The building manager said GEBREMEDHIN  
11 was not listed as associated with any other apartments at that complex.

12 188. The building manager recognized the Cadillac Escalade (TV5) bearing  
13 WA/BMA8616, as it had been the subject of a parking complaint in their parking  
14 garage on February 6, 2023. The building manager told investigators that parking stall  
15 #239 was registered to Apartment 337. While communicating with investigators, the  
16 building manager advised a white Chevrolet Blazer SUV was currently parked in that  
17 parking stall, which was bearing WA/CCW6156. A check of that license plate showed  
18 the Chevrolet Blazer was registered to Robel Sisay GEBREMEDHIN at **Target**  
19 **Location 1**.

20 189. At a later date, a property manager provided investigators with  
21 surveillance video from The Maverick Apartments (TL1) from February 26, 2023,  
22 which showed Robel GEBREMEDHIN leaving an exterior exit of The Maverick  
23 Apartments at about 3:57 PM. GEBREMEDHIN appeared to be alone. The video  
24 shows GEBREMEDHIN walk to Target Vehicle 5 and leave the area in the vehicle.  
25 The following is a snapshot of the video footage provided to investigators:

26 //

27 //

28 //



190. Investigators noticed that GEBREMEDHIN appeared to be wearing the same tan backpack later found (on February 27, 2023) to contain the suspected fentanyl-laced pills, the firearm, baggies, scales, and other evidence.

March 2, 2023: Seizure of 1,000 fentanyl pills from Ahbdurman AHMED.

191. On March 2, 2023, investigators were conducting surveillance on Ahbdurman AHMED, driving the white Tesla bearing WA/CFC3954 (TV1), in Whatcom County, WA. At about 5:50 PM, investigators saw TV1 drive into a Safeway grocery store parking lot in Bellingham, WA. Plainclothes investigators saw a male walk up to the vehicle and get into the back seat. Investigators recognized, based on their training and experience, the interaction as being consistent with a drug transaction. TV1 was stopped by WCSO Deputy Chambers and WSP Trooper Reese.

192. Law enforcement identified the driver as Ahbdurman AHMED, and a backseat passenger as Matthew ANDERSON. There was also a female passenger.

1 Bellingham Police Officer Woodward deployed a narcotics detection canine around  
2 TV1, which alerted to the presence of the odor of narcotics.

3 193. AHMED consented to a search of TV1. Under the driver's seat, law  
4 enforcement located a bag containing approximately 113.1 gross grams of suspected  
5 fentanyl-laced pills (estimated to be approximately one thousand pills) and a bag  
6 containing 4.8 gross weight grams of suspected cocaine. AHMED had admitted there  
7 would be small amount of cocaine in the vehicle but denied any knowledge or  
8 ownership of the suspected fentanyl-laced pills. AHMED told law enforcement he  
9 sometimes went by the name "O".

10 194. Law enforcement spoke with Matthew ANDERSON, who had been  
11 found in possession of approximately \$1,952.00 in US currency. After being advised of  
12 the Miranda warnings, ANDERSON said he had been meeting with AHMED to make a  
13 payment on a drug debt he owed for fentanyl-laced pills. ANDERSON told law  
14 enforcement he was afraid that "Malik", who was AHMED's partner, would hurt him if  
15 he did not pay back the debt. Investigators recognized the moniker of "Malik" and/or  
16 "Maleek" as being associated with Mohamed MOHAMED.

17 Conclusion.

18 Investigators believe that Robel GEBREMEDHIN, Mohamed MOHAMED,  
19 Ahbdurman AHMED, Daniel John FAIX, Natasha PARKHILL, and MATTHEW  
20 ANDERSON are actively involved in a conspiracy to engage in drug trafficking.

21 Overview of Criminal Histories.

22 195. Your Affiant has reviewed copies of judgment and sentence documents  
23 and determined that Mohamed Abdirisak MOHAMED has the following felony  
24 convictions punishable by a term of imprisonment exceeding one year:

25 i. Robbery in the Second Degree (two counts), in King County  
26 Superior Court, under case number 15-1-00309-3, on or about June 10, 2015;  
and

27 ii. Robbery in the First Degree, in King County Superior Court, under  
28 case number 15-1-01591-1, on or about June 10, 2015.

1 Accordingly, Mohamed Abdirisak MOHAMED is a felon and prohibited from  
2 possessing a handgun.

3 196. Your affiant reviewed copies of judgment and sentence documents and  
4 determined that Robel Sisay GEBREMEDHIN (a/k/a ROBEL SISAY  
5 GEBREMEDHUI) has the following felony convictions punishable by a term of  
6 imprisonment exceeding one year:

7 i. Felon in Possession of a Firearm, in United States District Court  
8 for the Western District of Washington, under case number CR14-352RSL, on or  
about July 23, 2015;

9 ii. Conspiracy to Distribute Cocaine Base, in United States District  
10 Court for the Western District of Washington, under case number CR04-  
11 026RSL, on or about January 5, 2007;

12 iii. Manufacture/Delivery/Possession with Intent of a Controlled  
13 Substance, in King County Superior Court, under case number 04-1-004884-4,  
on or about September 9, 2004;

14 iv. Assault in the Third Degree, in King County Superior Court, under  
15 case number 01-1-103194-1, on or about August 31, 2001; and

16 v. Unlawful Imprisonment, in King County Superior Court, under  
case number 01-1-103194-1, on or about August 31, 2001.

17 Accordingly, Robel Sisay GEBREMEDHIN (a/k/a ROBEL SISAY GEBREMEDHUI)  
18 is a felon and prohibited from possessing a handgun.

19 **KNOWLEDGE BASED ON TRAINING AND EXPERIENCE**

20 197. Based upon my training and experience, and my discussions with other  
21 experienced officers and agents experienced in drug and money laundering  
22 investigations, I know the following:

23 a. During the execution of search warrants, it is common to find papers,  
24 letters, billings, documents, and other writings that show ownership, dominion, and  
25 control of vehicles, residences, and/or storage units.

26 b. It is common for drug dealers to secrete contraband, proceeds of drug  
27 sales, and records of drug transactions in secure locations within their vehicles,  
28

1 residences, and/or storage units for their ready access and to conceal them from law  
2 enforcement.

3 c. Narcotics traffickers maintain books, records, receipts, notes, ledgers,  
4 airline tickets, money orders, and other papers relating to the transportation, ordering,  
5 sale, and distribution of controlled substances. Narcotics traffickers commonly “front,”  
6 that is, provide on consignment, controlled substances to their clients. These books,  
7 records, receipts, notes, and ledgers, commonly known as “pay and owe sheets,” are  
8 maintained where traffickers have ready access to them.

9 d. Traffickers of controlled substances, and those who assist them, maintain  
10 and tend to retain accounts or records of their drug trafficking activities, including lists  
11 of drug quantities and money owed, telephone records including contact names and  
12 numbers, photographs, and similar records of evidentiary value. These items are  
13 generally kept in locations where drug traffickers believe their property is secure and  
14 will remain undetected from law enforcement, such as inside their homes and vehicles.  
15 Sometimes, these locations are not their primary residence, but instead used for the  
16 purposes of storing and distributing drugs.

17 e. Traffickers of controlled substances commonly maintain records  
18 reflecting names or nicknames, addresses, vehicles, and/or telephone numbers of their  
19 suppliers, customers and associates in the trafficking organization. Traffickers  
20 commonly maintain this information in books or papers as well as in cellular telephones  
21 and other electronic devices. Traffickers often maintain cellular telephones for ready  
22 access to their clientele and to maintain their ongoing narcotics business. Traffickers  
23 frequently change their cellular telephone numbers to avoid detection by law  
24 enforcement, and it is common for traffickers to use more than one cellular telephone at  
25 any one time.

26 f. Traffickers maintain evidence of their criminal activity at locations that  
27 are convenient to them, including their residences and vehicles. This evidence often  
28 includes more than contraband and paraphernalia and includes financial records,



1 records of property and vehicle ownership, records of property rented, records of  
2 storage facilities used to hide drugs or currency, and other documentary evidence  
3 relating to commission of, and proceeds from, their crimes. Narcotics traffickers  
4 sometimes take or cause to be taken photographs and/or video recordings of  
5 themselves, their associates, their property, and their illegal product, or have photo or  
6 video security systems that record images from their homes or property. These  
7 individuals usually maintain these photographs and recordings in their possession or at  
8 their premises, in a safe place. Such evidence may be kept at a safe location for a long  
9 time after the drug deal(s) to which they pertain are completed, if the location remains  
10 under the control of the trafficker.

11 g. Traffickers frequently maintain items necessary for weighing, packaging  
12 and cutting drugs for distribution. This paraphernalia often includes, but is not limited  
13 to, scales, plastic bags and other packaging materials, sifters, containers, and  
14 cutting/diluting agents and items to mask the odor of narcotics. Persons trafficking and  
15 using controlled substances frequently sell more than one type of controlled substance  
16 at any one time.

17 h. It is common for drug dealers to also be users of their product, and it is  
18 common for drug users to maintain paraphernalia associated with the use of controlled  
19 substances, such as syringes, pipes, spoons, containers, straws, and razor blades.

20 i. Traffickers frequently maintain records, books, notes, ledgers, travel  
21 documents, and other papers relating to the transportation and distribution of controlled  
22 substances in locations convenient to them, such as their residences and vehicles.

23 j. Traffickers often maintain weapons, including firearms and ammunition,  
24 in secure locations such as their residences and vehicles, in order to protect their drugs  
25 and drug proceeds.

26 k. Traffickers often have false identification documents and identification  
27 documents in the names of others. Traffickers very often place assets in names other  
28 than their own, or use fictitious names and identification, to avoid detection of these

1 assets by government agencies, while continuing to use these assets and exercise  
2 dominion and control over them.

3 l. Drug trafficking is a cash business, often involving large amounts of cash  
4 at any one time, so drug traffickers often have money counters.

5 m. A common method that drug traffickers use to distribute drugs is through  
6 the use of passenger vehicles. Similarly, the proceeds of the sales of drugs are  
7 sometimes transported back in the same manner. Vehicles used by drug traffickers are  
8 often placed in fictitious or nominee names, and outfitted with concealed compartments  
9 where the drugs and drug proceeds can be hidden to lessen the likelihood of  
10 interdiction.

11 n. Persons involved in drug trafficking conceal in their residences caches of  
12 drugs, large amounts of currency, financial instructions, precious metals, jewelry, and  
13 other items of value and/or proceeds of drug transactions as well as evidence of  
14 financial transactions relating to obtaining, transferring, secreting, or the spending of  
15 large sums of money made from engaging in narcotics trafficking activities.

16 o. Unexplained wealth is probative evidence of crimes motivated by greed,  
17 in particular, trafficking in controlled substances.

18 p. Illegal drug trafficking is a continuing activity over months and even  
19 years. Illegal drug traffickers will repeatedly obtain and distribute controlled  
20 substances on a somewhat regular basis, much as any distributor of a legitimate  
21 commodity would purchase stock for sale, and, similarly, drug traffickers will have an  
22 "inventory," which fluctuates in size depending upon various factors, including the  
23 demand and supply for the product. I would expect the trafficker to keep records of  
24 their illegal activities for a period of time extending beyond the time during which they  
25 actually possesses illegal controlled substances, in order that they can maintain contact  
26 with his criminal associates for future drug transactions, and so that they can have  
27 records of prior transactions for which, for example, they might still be owed money, or  
28 might owe someone else money. These records are often created in code.

1           q.     Drug trafficking is a cash business, and in order to escape notice from  
2 authorities for using unexplained income, or hide excessive cash from illegal activities,  
3 traffickers either keep large quantities of cash at home or other secure locations, such as  
4 safe deposit boxes, or convert the cash into other valuable assets, such as jewelry,  
5 precious metals, monetary instruments, or other negotiable forms of wealth. Records of  
6 such conversions are often stored where a trafficker lives or in other secure locations  
7 such as safe deposit boxes.

8           r.     Money launderers often have banking records to include, but not limited  
9 to, deposit or withdrawal slips, bank statements, checks, or money orders. These items  
10 can be found in residences, vehicles, storage units, cellular phones, digital devices,  
11 among other locations. Some of these banking records may not be in their own name.  
12 Money launderers often have several accounts documented in some form, or  
13 instructions detailing how to handle each respective account. For example, they may  
14 have a list of accounts belonging to several different people with instructions for how  
15 much to deposit or withdraw from each and often maintain this information for long  
16 periods of time in their residences or safe deposit boxes.

17           s.     Money launderers often have records or evidence related to how the  
18 proceeds were spent or concealed and often maintain this information for long periods  
19 of time in their residences or safe deposit boxes. Evidence may include jewelry and/or  
20 vehicles, as well as the contents of storage lockers, safe deposit boxes or bank accounts.

21     The use of bank accounts is a common money movement technique used by drug  
22 traffickers to receive payment for narcotics from customers outside of their geographic  
23 region. It is common for a trafficker to use several bank accounts for this purpose  
24 simultaneously in an attempt to avoid detection by the financial institutions and/or law  
25 enforcement. The use of multiple accounts, and the commingling of illicit funds with  
26 legitimate funds in particular, is often part of the plan to conceal the illegal activity or  
27 may be part of the overall integration mechanism by which the illicit funds are made to  
28

1 appear as part of the legitimate income so that only a small portion of or even none of  
2 the funds from an account are seized.

3 t. I know from my training and experience that Mexico-based DTOs  
4 frequently use various wire-remitter services and multiple senders to transfer money in  
5 relatively small increments to multiple recipients. DTOs employ such tactics in an  
6 effort to avoid triggering mandatory financial-reporting requirements of the wire-  
7 remitter operators and to avoid law enforcement detection. I also know from my  
8 training and experience that Mexico-based DTOs often use such wire transfers in order  
9 to quickly move a small portion of drug proceeds out of the United States and into the  
10 possession of DTO operatives and leadership in Mexico, with the bulk of the cash drug  
11 proceeds to follow later.

12 u. Based on my training and experience, I know that international money  
13 transfers among DTO members can be made through various digital money transfer  
14 services utilizing internet-connected digital devices such as desktop and laptop  
15 computers. In addition, those digital devices can be used by DTO members to access,  
16 store, send, and receive records related to such international money transfers.  
17 Accordingly, internet-connected digital devices owned or used by DTO members could  
18 harbor evidence of money laundering.

19 198. Also based on my training and experience, and that of other investigators  
20 I have talked to, I know that drug dealers use cellular telephones as a tool or  
21 instrumentality in committing their criminal activity, to include laundering their  
22 proceeds. They use them to maintain contact with their suppliers, distributors, and  
23 customers. They prefer cellular telephones because, first, they can be purchased  
24 without the location and personal information that land lines require. Second, they can  
25 be easily carried to permit the user maximum flexibility in meeting associates, avoiding  
26 police surveillance, and traveling to obtain or distribute drugs. Third, they can be  
27 passed between members of a drug conspiracy to allow substitution when one member  
28 leaves the area temporarily. Since cellular phone use became widespread, every drug

1 dealer I have contacted has used one or more cellular telephones for his or her drug  
2 business. I also know that it is common for drug traffickers to retain in their possession  
3 phones that they previously used, but have discontinued actively using, for their drug  
4 trafficking business. These items may be kept for months and months in a safe place  
5 controlled by the drug trafficker. Based on my training and experience, the data  
6 maintained in a cellular telephone used by a drug dealer is evidence of a crime or  
7 crimes. This includes the following:

8           a.       The assigned number to the cellular telephone (known as the  
9 mobile directory number or MDN), and the identifying telephone serial number  
10 (Electronic Serial Number, or ESN), (Mobile Identification Number, or MIN),  
11 (International Mobile Subscriber Identity, or IMSI), or (International Mobile Equipment  
12 Identity, or IMEI) are important evidence because they reveal the service provider,  
13 allow us to obtain subscriber information, and uniquely identify the telephone. This  
14 information can be used to obtain toll records, to identify contacts by this telephone  
15 with other cellular telephones used by co-conspirators, to identify other telephones used  
16 by the same subscriber or purchased as part of a package, and to confirm if the  
17 telephone was contacted by a cooperating source.

18           b.       The stored list of recent received, missed, and sent calls is  
19 important evidence. It identifies telephones recently in contact with the telephone user.  
20 This is valuable information in a drug investigation because it will identify telephones  
21 used by other members of the organization, such as suppliers, distributors and  
22 customers, and it confirms the date and time of contacts. If the user is under  
23 surveillance, it identifies what number he called during or around the time of a drug  
24 transaction or surveilled meeting. Even if a contact involves a telephone user not part  
25 of the conspiracy, the information is helpful (and thus is evidence) because it leads to  
26 friends and associates of the user who can identify the user, help locate the user, and  
27 provide information about the user. Identifying a defendant's law-abiding friends is  
28 often just as useful as identifying his drug-trafficking associates.

1 c. Stored text messages are important evidence, similar to stored  
2 numbers. Agents can identify both drug associates, and friends of the user who likely  
3 have helpful information about the user, his location, and his activities.

4 d. Drug traffickers increasingly use applications on smart phones that  
5 encrypt communications such as WhatsApp, or applications that automatically delete  
6 messages, such as Snapchat, in order to avoid law enforcement monitoring or recording  
7 of communications regarding drug trafficking and/or money laundering. Evidence of  
8 the use of such applications can be obtained from smart phones, and is evidence of a  
9 smart phone user's efforts to avoid law enforcement detection.

10 e. Photographs on a cellular telephone are evidence because they help  
11 identify the user, either through his or her own picture, or through pictures of friends,  
12 family, and associates that can identify the user. Pictures also identify associates likely  
13 to be members of the drug trafficking organization. Some drug dealers photograph  
14 groups of associates, sometimes posing with weapons and showing identifiable gang  
15 signs. Also, digital photos often have embedded "geocode" or GPS information  
16 embedded in them. Geocode information is typically the longitude and latitude where  
17 the photo was taken. Showing where the photo was taken can have evidentiary value.  
18 This location information is helpful because, for example, it can show where  
19 coconspirators meet, where they travel, and where assets might be located. Drug  
20 traffickers often take "screen shot" photos of text threads and contact information for  
21 re-distributors or suppliers, as well as photos of drug pay/owe ledgers and payment  
22 remittances. Drug traffickers sometimes take photos of their product to send to their  
23 customers or suppliers during their telephonic communications.

24 f. Stored address records are important evidence because they show  
25 the user's close associates and family members, and they contain names and nicknames  
26 connected to phone numbers that can be used to identify suspects.



1 **CONCLUSION**

2 128. Based on the information set forth herein, there is probable cause to  
3 search the above described Target Location and Target Vehicle(s), as further described  
4 in Attachment A, for evidence, fruits and instrumentalities, as further described in  
5 Attachment B, of crimes committed by the individuals listed in this affidavit and their  
6 coconspirators, specifically Distribution of, and Possession with Intent to Distribute,  
7 Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1);  
8 Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States  
9 Code, Sections 841(a)(1) and 846; Unlawful Possession of a Firearm, in violation of 18  
10 United States Code, Section 922(g)(1); and/or Possession of Firearms in Furtherance of  
11 a Drug Trafficking Crime, in violation of Title 18, United States Code, Section 924(c).  
12

13 

14 Christopher L. VandenBos  
15 Task Force Officer  
16 Drug Enforcement Administration

17 The above-named agent provided a sworn statement attesting to the truth of the contents  
18 of the foregoing affidavit on the 30<sup>th</sup> day of March, 2023.  
19

20 

21 MARY ALICE THEILER  
22 United States Magistrate Judge  
23  
24  
25  
26  
27  
28

**ATTACHMENT A**

**PROPERTY TO BE SEARCHED**

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found.

For physical locations, this includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports, parking stalls, specifically the parking stall numbered “239”, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location described below.

For vehicles to be searched, this includes all areas of the vehicle, all compartments, and all containers within that vehicle, whether locked or not.

## Residence

### Target Location 1: 15045 5<sup>th</sup> Avenue SW, Unit 337, Burien, Washington 98166

15045 5<sup>th</sup> Avenue SW, Unit 337, Burien, Washington 98166 is an apartment located in an apartment complex in Burien, WA named “The Maverick”. Unit 337 has a grey door and a silver door handle. There is a circular orange sign to the right of the apartment door with the number “337” printed on it.



**Vehicles**

**Target Vehicle 1: a white Tesla Model 3 (WA /CFC3954)**

A white Tesla Model 3 sedan bearing the Washington plate CFC3954.

**Target Vehicle 5: a black Cadillac Escalade (WA /BMA8616)**

A black 2013 Cadillac Escalade sports utility vehicle (SUV) bearing the Washington plate BMA8616.

**ATTACHMENT B****(ITEMS TO BE SEARCHED AND SEIZED)**

This warrant authorizes the government to search for the following evidence, fruits, and/or instrumentalities of Distribution and/or Possession of Controlled Substances with Intent to Distribute in violation of 21 U.S.C. § 841(a)(1), Conspiracy to Distribute Controlled Substances in violation of Title 21, United States Code, Section 846, Unlawful Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1), and Possession of Firearms in Furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c),

1. Controlled Substances and controlled substance analogues.

2. Drug Paraphernalia and Instruments of Drug Trafficking: Items used, or to be used, to store, process, package, use, and/or distribute controlled substances; plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances.

3. Drug Transaction Records: Documents such as ledgers, receipts, and notes relating to the acquisition, transportation, and distribution of controlled substances, however stored, including in digital devices.

4. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, "pay/owe sheets" with drug amounts and prices, and maps or directions.

5. Cash and Financial Records: Currency and financial records, such as bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, and vehicle documents; records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, and cashier's checks.

6. Photographs/Video: Photographs, video tapes, digital cameras, surveillance cameras, and associated hardware/storage devices depicting property occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances.

7. Weapons, including firearms, magazines, ammunition, and body armor.

1           8.     Codes: Evidence of codes used in the distribution of controlled  
2 substances, such as passwords, code books, cypher or decryption keys.

3           9.     Property Records: Deeds, contracts, escrow documents, mortgage  
4 documents, rental documents, and other evidence relating to the purchase, ownership,  
5 rental, income, expenses, or control of the Target Residence, and similar records of  
6 other property owned or rented.

7           10.    Indicia of occupancy, residency, and/or ownership of assets such as utility  
8 and telephone bills, canceled envelopes, rental records or payment receipts, leases, and  
9 mortgage statements.

10          11.    Evidence of storage unit rental or access such as rental and payment  
11 records, keys and codes, pamphlets, contracts, contact information, directions, and  
12 passwords.

13          12.    Evidence of Personal Property Ownership: Registration information,  
14 ownership documents, or other evidence of ownership of personal property such as  
15 vehicles, vessels, boats, airplanes, jet skis, all-terrain vehicles, RVs, and jewelry;  
16 evidence of international or domestic travel, hotel stays, and other evidence of  
17 unexplained wealth.

18          13.    Individual and business financial books, records, receipts, notes, ledgers,  
19 diaries, journals, and all records relating to income, profit, expenditures, or losses, such  
20 as:

21               a.     Employment records: paychecks or stubs, lists and accounts of  
22 employee payrolls, records of employment tax withholdings and contributions,  
23 dividends, stock certificates, and compensation to officers.

24               b.     Savings accounts: statements, ledger cards, deposit tickets,  
25 register records, wire transfer records, correspondence, and withdrawal slips.

26               c.     Checking accounts: statements, canceled checks, deposit tickets,  
27 credit/debit documents, wire transfer documents, correspondence, and register records.

28               d.     Loan Accounts: financial statements and loan applications for all  
loans applied for, notes, loan repayment records, and mortgage loan records.

              e.     Collection account statements and other-related records.

              f.     Certificates of deposit: applications, purchase documents, and  
statements of accounts.

              g.     Credit card accounts: credit cards, monthly statements, and  
receipts of use.



1 h. Receipts and records related to gambling wins and losses, or any  
2 other contest winnings.

3 i. Insurance: policies, statements, bills, and claim-related  
4 documents.

5 j. Financial records: profit and loss statements, financial statements,  
6 receipts, balance sheets, accounting work papers, any receipts showing purchases made,  
7 both business and personal, receipts showing charitable contributions, and income and  
8 expense ledgers.

9 14. All bearer bonds, letters of credit, money drafts, money orders, cashier's  
10 checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money  
11 wrappers, stored value cards, and other forms of financial remuneration evidencing the  
12 obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of  
13 money.

14 15. All Western Union and/or Money Gram documents and other financial  
15 documents evidencing domestic or international wire transfers, money orders, official  
16 checks, cashier's checks, or other negotiable interests that can be purchased with cash,  
17 including applications, payment records, money orders, and frequent customer cards.

18 16. Negotiable instruments, jewelry, precious metals, and financial  
19 instruments.

20 17. Documents reflecting the source, receipt, transfer, control, ownership, and  
21 disposition of United States and/or foreign currency.

22 18. Correspondence, papers, records, and any other items showing  
23 employment or lack of employment.

24 19. Phone books, address books, any papers or documents reflecting names,  
25 addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile,  
26 and/or telex numbers, telephone records and bills relating to co-conspirators, sources of  
27 supply, customers, financial institutions, and other individuals or businesses with whom  
28 a financial relationship exists; telephone answering devices that record telephone  
conversations and the tapes therein for messages left for or by co-conspirators for the  
delivery or purchase of controlled substances or laundering of drug proceeds.

20. Safes and locked storage containers, and the contents thereof which are  
otherwise described in this document.

1        21. Tools that may be used to open hidden compartments in vehicles, such as  
2 paint, bonding agents, magnets, or other items that may be used to open/close said  
3 compartments.

4        22. Digital computing devices, *e.g.*, desktop and laptop computers and table  
5 devices; digital storage devices, *e.g.*, external hard drives and USB thumb drives, and;  
6 optical and magnetic storage media, *e.g.*, Blue Ray discs, DVDs and CDs.

7        23. Pill press machine, encapsulating machine, and other tools or equipment  
8 used to manufacture pills

9        24. Cell Phones and other digital communication devices for evidence, fruits,  
10 and/or instrumentalities of the above-referenced crimes, specifically:

11            a. Assigned number and identifying telephone serial number (ESN,  
12 MIN, IMSI, or IMEI);

13            b. Stored list of recent received, sent, or missed calls;

14            c. Stored contact information;

15            d. Stored photographs and videos of narcotics, currency, financial  
16 records (such as deposit slips and other bank records), RVs and other vehicles, firearms  
17 or other weapons, evidence of the aforementioned crimes of investigation, and/or that  
18 may show the user of the phone and/or coconspirators, including any embedded GPS  
19 data associated with these photographs; and

20            e. Stored text messages that are evidence of the above-listed federal  
21 crimes or that may identify the user of the seized phones and/or coconspirators,  
22 including messages sent via messaging apps, including Wickr, Signal, WhatsApp, and  
23 Telegram, or other similar messaging services where the data is stored on the telephone  
24  
25  
26  
27  
28